

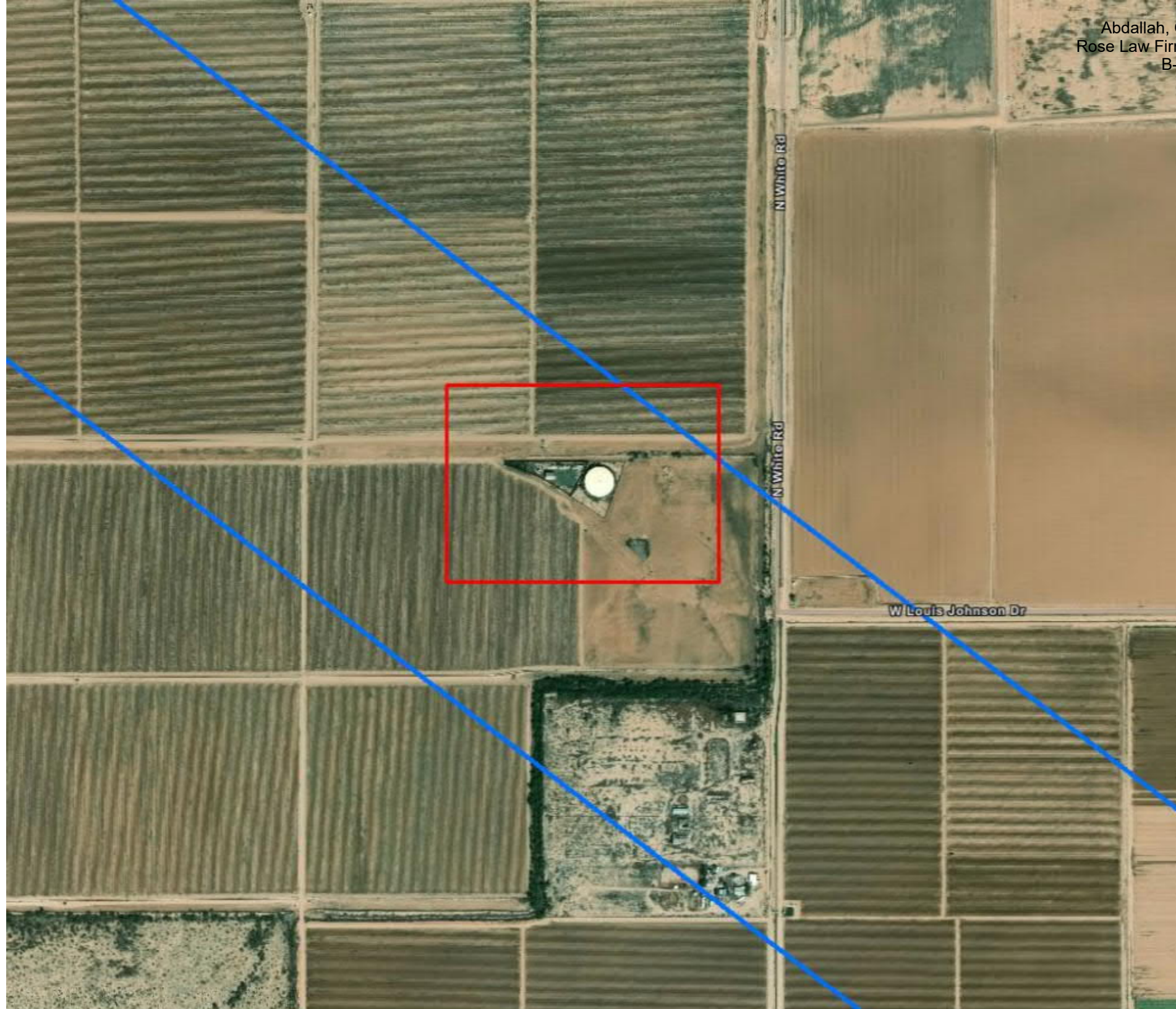


TERRAZO UNIT Z			
Parcel	Acres	Lots	Lot Size
Parcel 2-4	41.640	121	45x115
Parcel 2-5	29.830	83	65x120
Parcel 2-6	25.650	98	55x115
Parcel 2-7	30.750	98	55x115
Parcel 2-8	27.880	127	45x115
Parcel 2-9	25.620	124	45x115
Parcel 2-10	21.970	112	45x115
Parcel 2-11	22.170	86	55x115
Parcel 2-12	26.640	99	55x115
Parcel 2-13	36.890	100	65x120
Gross Total	289.940	1048	
Parcel 2-1	4.410	Water	
Parcel 2-2	2.790	Community Park	
Parcel 2-3	12.340	Elementary School	

TERRAZO UNIT 3			
Parcel	Acres	Lots	Lot Size
Parcel 3-1	25.290	129	45x115
Parcel 3-2	30.060	100	55x115
Parcel 3-3	24.610	111	45x115
Parcel 3-4	30.560	102	55x115
Parcel 3-5	35.700	111	65x120
Parcel 3-6	35.700	96	55x115
Parcel 3-7	26.420	75	65x120
Parcel 3-8	27.830	127	45x115
Gross Total	231.290	111	

DATE: 12-4-05







INTERSTATE 11 PROPOSED ROUTES - TERRAZO

MARICOPA, ARIZONA

**TERRAZO ALT.
ROUTE # 1**

Recommended Alternative



Alternatives

Purple Alternative



Terrazo Alternative



PETERS & NAILS RD.

PAPAGO RD.

VAL VISTA DR.

TEEL RD.

BARNS RD.

CENTURY RD.

TABLE TOP RD.

SAGE ST.

WARREN RD.

RALSTON RD.

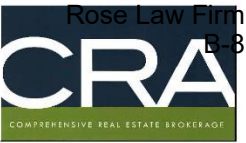
WHITE RD.

GREEN RD.

SMITH RD.

PORTER RD.

STANFIELD RD.



Maricopa

Interstate 11 Corridor
Possible Routes

Corridors

Recommended Alternative



Alternatives

Purple Alternative



Green Alternative



Orange Alternative



Land Use Information

- Low Density Residential
- Medium to High Density Residential
- High Density Residential
- Retail and Commercial
- Industrial and Employment
- Parks and Open Space
- Reservation
- State Land
- Federal Land
- Casa Grande City Boundary
- Maricopa City Annexation
- Existing Highway
- Proposed Highway
- Railroad

TERRAZO ALT.
ROUTE # 1

Recommended Alternative

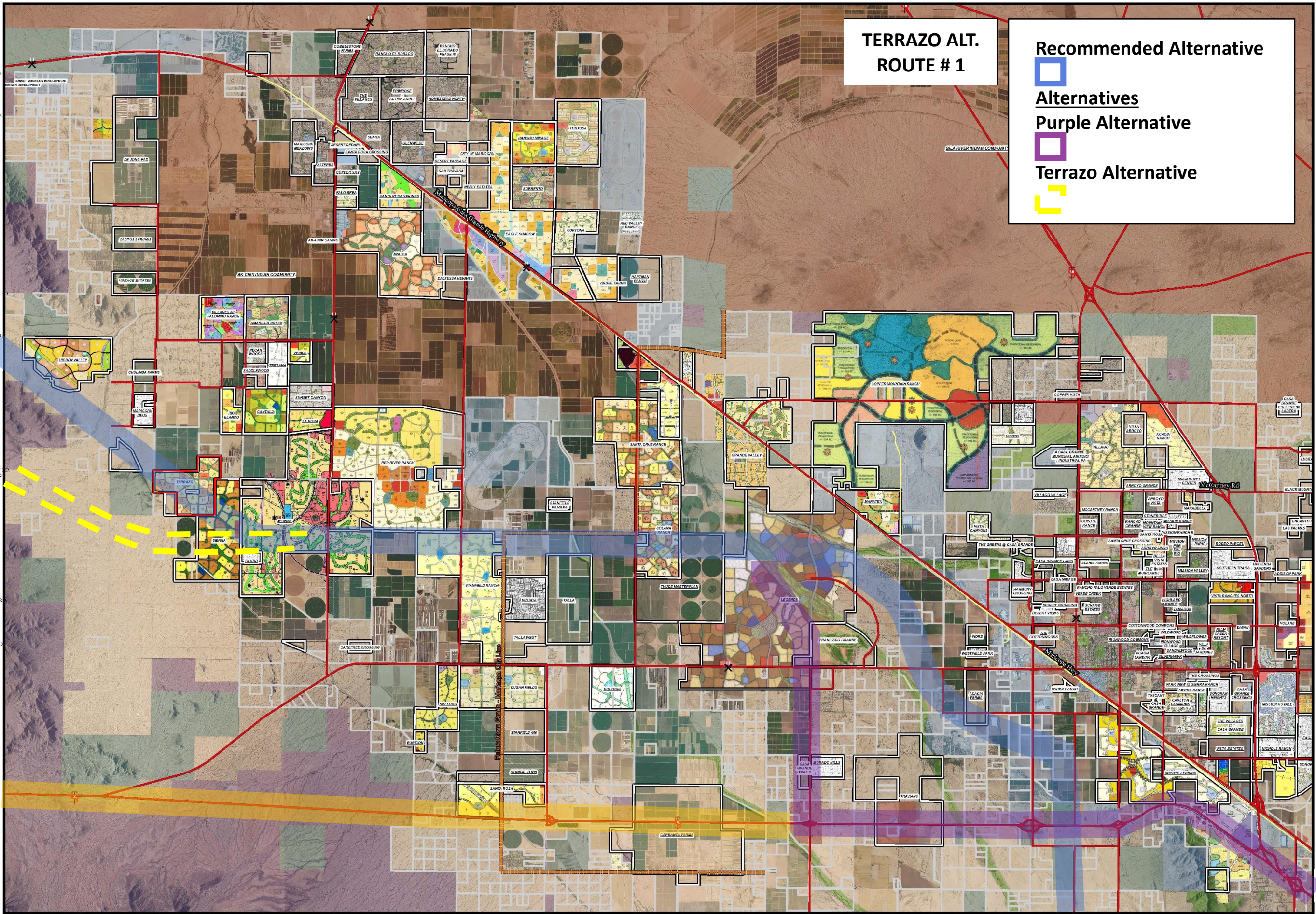


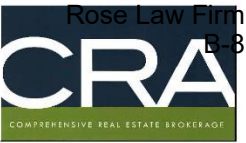
Alternatives

Purple Alternative



Terrazo Alternative





Maricopa

Interstate 11 Corridor
Possible Routes

Corridors

Recommended Alternative



Alternatives

Purple Alternative



Green Alternative



Orange Alternative



Land Use Information

- Low Density Residential
- Medium to High Density Residential
- High Density Residential
- Retail and Commercial
- Industrial and Employment
- Parks and Open Space
- Reservation
- State Land
- Federal Land
- Casa Grande City Boundary
- Maricopa City Annexation
- Existing Highway
- Proposed Highway
- Railroad

TERRAZO ALT.
ROUTE # 2

Recommended Alternative



Alternatives

Purple Alternative



Terrazo Alternative



HILLER RD.
SMITH-RNKE RD.
MCDAVID RD.
HONEYCUTT RD.
BOWLIN RD.
FARRBELL RD.
STEEN RD.
PETERS & NALL RD.
PARAGO RD.
GHOST RANCH RD.
VAL VISTA RD.
TEEL RD.
MILLER RD.
LOUIS JOHNSON RD.
MCCARTNEY RD.
BARNES RD.
KORTSEN RD.
CLAYTON RD.
COTTONWOOD RD.
FLORENCE BLVD.
PETERS RD.
SELMA HWY.
CARRANZA RD.
CORNWALL RD.
BEGGS RD.
CONELLEY RD.

HIDDEN VALLEY RD.
WARREN RD.
RALSTON RD.
WHITE RD.
AMARILLO VALLEY RD.
GREEN RD.
MARICOPA RD.
SMITH RD.
PORTER RD.
WHITE & PARKER RD.
TUCCA RD.
STANFIELD RD.
HARTMAN RD.
MURPHY RD.
ANDERSON RD.
RUSSELL RD.
INDIAN VALLEY RD.
MIDWAY RD.
MONTGOMERY RD.
CONALEIS RD.
RANCHO RD.
KIMMINGTON RD.
DUBUIS RD.
THURNTON RD.
PINAL AVE.
TESKELL RD.
PEARL RD.
HENNESSY RD.
COX RD.
HACIENDA RD.



INTERSTATE 11 PROPOSED ROUTES - TERRAZO

MARICOPA, ARIZONA

**TERRAZO ALT.
ROUTE # 2**

Recommended Alternative



Alternatives

Purple Alternative



Terrazo Alternative



PETERS & NAILS RD.

PAPAGO RD.

VAL VISTA DR.

TEEL RD.

BARNS RD.

CENTURY RD.

TABLE TOP RD.

SAGE ST.

WARREN RD.

RALSTON RD.

WHITE RD.

GREEN RD.

SMITH RD.

PORTER RD.

STANFIELD RD.

When recorded return to:
Clerk of the Board
P.O. Box 827
Florence AZ 85132

RESOLUTION NO. _____

A RESOLUTION OF THE PINAL COUNTY, ARIZONA, BOARD OF SUPERVISORS DECLARING SUPPORT FOR THE FEDERAL HIGHWAY ADMINISTRATION AND ARIZONA DEPARTMENT OF TRANSPORTATION'S INTERSTATE 11 TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(F) EVALUATION

WHEREAS, in November 2014, the Federal Highway Administration (FHWA), Arizona Department of Transportation (ADOT), Nevada Department of Transportation, Maricopa Association of Governments, Regional Transportation Commission of Southern Nevada, and other key stakeholders completed an initial two-year feasibility study known as the Interstate 11 (I-11) and Intermountain West Corridor Study; and

WHEREAS, in May 2016, FHWA and ADOT issued a Notice of Intent to commence with a three year Tier 1 Environmental Impact Statement to select a corridor alternative for I-11 between Nogales and Wickenburg; and

WHEREAS, the I-11 Corridor Study Area is 280 miles long and the environmental review process examines and evaluates the No Build Alternative and a 2,000-foot wide Project Area for three Build Corridor Alternatives in which the I-11 alignment could be located; and

WHEREAS, the I-11 Corridor Study Area traverses the counties of Santa Cruz, Pima, Pinal, Maricopa, and Yavapai within central and southern Arizona; and

WHEREAS, the Pinal County Board of Supervisors supports the environmental review process for the location of I-11 in accordance with the National Environmental Policy Act and other regulatory requirements; and

WHEREAS, the Pinal County Board of Supervisors declares its support for Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) and Option I1 (Montgomery Road alignment) identified in the Alternative Selections Report dated December 2017 as they are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017.

NOW THEREFORE, IT IS HEREBY RESOLVED that the Pinal County Board of Supervisors declares its support of the following:

- 1) The environmental review process for the location of I-11; and,
- 2) Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 EIS and Option I1 (Montgomery Road alignment) identified in the Alternative Selections Report dated December 2017 as these options are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017; and,
- 3) Options I2 and I1 are in accordance with other local and county level plans and provide alternate, high capacity routes to serve planned growth and economic centers in western Pinal County while avoiding the planned development and expansion of the Lucid Motors and Tractor Supply Distribution Center in Casa Grande as depicted in Exhibit A; and,
- 4) Options I2 and I1 best meet the Purpose and Need of the Draft Tier 1 EIS as they promote freight movement, link communities, and strengthen economic development and job growth within Pinal County.
- 5) Provided that caution is exercised so as to not negatively impact the existing Global Water multi-million dollar facility in the City of Maricopa as it is essential to providing water utility service for the region.

PASSED AND ADOPTED this _____ day of _____, 2019, by the
PINAL COUNTY BOARD OF SUPERVISORS.

Chairman of the Board

ATTEST:

Clerk of the Board

APPROVED AS TO FORM:

Deputy County Attorney

RESOLUTION NO. 19-20

A RESOLUTION OF THE MAYOR AND CITY COUNCIL OF THE CITY OF MARICOPA, ARIZONA, ENDORSING THE PINAL COUNTY I-11 COALITION'S SUPPORT FOR THE FEDERAL HIGHWAY ADMINISTRATION AND ARIZONA DEPARTMENT OF TRANSPORTATION'S INTERSTATE 11 TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(F) EVALUATION.

WHEREAS, in November 2014, the Federal Highway Administration (FHWA), Arizona Department of Transportation (ADOT), Nevada Department of Transportation, Maricopa Association of Governments, Regional Transportation Commission of Southern Nevada, and other key stakeholders completed an initial two-year feasibility study known as the Interstate 11 (I-11) and Intermountain West Corridor Study; and,

WHEREAS, in May 2016, FHWA and ADOT issued a Notice of Intent to commence with a three-year Tier 1 Environmental Impact Statement to select a corridor alternative for I-11 between Nogales and Wickenburg; and,

WHEREAS, the I-11 Corridor Study Area is 280 miles long and the environmental review process examines and evaluates the No Build Alternative and a 2,000-foot wide Project Area for three Build Corridor Alternatives in which the I-11 alignment could be located; and,

WHEREAS, the I-11 Corridor Study Area traverses the counties of Santa Cruz, Pima, Pinal, Maricopa, and Yavapai within central and southern Arizona; and,

WHEREAS, the City of Maricopa endorses Pinal County I-11 Coalition's support of the environmental review process for the location of I-11 in accordance with the National Environmental Policy Act and other regulatory requirements; and,

WHEREAS, the City of Maricopa also endorses Pinal County I-11 Coalition's support for Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) and Option I1 (Montgomery Road alignment) identified in the Alternative Selections Report dated December 2017 as they are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017.

NOW THEREFORE, BE IT RESOLVED, the Mayor and City Council of the City of Maricopa, Arizona hereby endorses Pinal County I-11 Coalition's support of the following:

- 1) The environmental review process for the location of I-11; and,
- 2) Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 EIS and Option I1 (Montgomery Road alignment) identified in the Alternative

Selections Report dated December 2017 as these options are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017; and,

- 3) Options I2 and I1 are in accordance with other local and county level plans and provide alternate, high capacity routes to serve planned growth and economic centers in western Pinal County while avoiding the planned development and expansion of the Lucid Motors and Tractor Supply Distribution Center in Casa Grande as depicted in Exhibit A; and,
- 4) Options I2 and I1 best meet the Purpose and Need of the Draft Tier 1 EIS as they promote freight movement, link communities, and strengthen economic development and job growth within Pinal County.
- 5) Provided that caution is exercised so as to not negatively impact the Terazzo Master Planned Development and/or the existing Global Water multi-million dollar water campus facility that is located within Terazzo and directly under the proposed route. This plant cannot be moved and is essential to providing regional water utility service in the Terazzo subdivision and beyond.

PASSED AND ADOPTED by the Mayor and Council of the City of Maricopa,
Arizona this 4th day of June, 2019.

Christian Price
Mayor

ATTEST:

APPROVED AS TO FORM:

Vanessa Bueras, MMC
City Clerk

Denis Fitzgibbons
City Attorney

I strongly oppose the proposal to build I-11 west of the Tucson Mountains, one of the remaining relatively unspoiled areas in our region. No matter its size, the highway would inevitably prompt ever-increasing development along its corridor, encouraging urbanization and pollution of a beautiful, environmentally sensitive rural expanse. The basic rationale for I-11 is streamlined economic development, yet even economic rationales argue against this destructive project. By ruining spectacular vistas and wildlife habitats that help make the Sonoran Desert and the Desert Museum world famous, the proposed highway would destroy the beauty and biological richness that draws so many visitors to our area, thus reducing tourism, one of Tucson's prime (and least environmentally damaging) economic engines.

Most important, this project will degrade or destroy precious, increasingly rare wildlife habitats, a prospect especially alarming in light of recent scientific evidence of widespread global species extinction caused by human impacts on the environment. In this time when the very planet is threatened by population explosion and environmental degradation, economic expansion should no longer be our sole or primary goal. Superhighways like this ought to be an artifact of the last century, not a model for a sustainable human future.

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13 June 2019

Dear ADOT,

This letter is designed to repeat the one you will receive from Elizabeth Makings whose views on the “preferred alternative” are comprehensive and totally convincing. As she notes, and I agree completely, we are never told who made the decision to build an entirely new highway and without that information we are left in the dark on an extremely important matter. As for the matter of economics, Elizabeth Makings effectively debunks the argument that a new road would provide a corridor that would support economic growth. She does so by pointing out that the current I-10 corridor does not exhibit signs of growth and economic vitality, and so why would a new highway promote commercial potential. The cost of a new highway would be enormous and would make economic justification of I-11 impossible in any event

With respect to the environmental effects of a new highway, Makings notes that the consultants hired by ADOT simply ignored the many comments made by true environmentalists and instead focused on one cactus species, apparently the only species of concern when in fact the new highway, if it is built, would destroy an important riparian area. Given the significance of water in our arid region, this is most unfortunate and calls into question the entire approach of the so-called environmental consultants that evaluated the various alternatives. As Makings points out, “The proposed (I-11) corridor is the most environmentally destructive alternative of the three presented and cannot be justified on any level.” No environmentalist would select this alternative over the existing corridors, especially given the cost of the new highway. According to Makings, and again I agree completely, the Orange alternative is preferred for a variety of reasons and I quote here:

- Widening of the established I-8 and I-10 corridors is the logical alternative as it will allow for higher capacity routes, improved safety and mobility.
- Increasing lanes along the I-10 is the economically superior alternative to building brand new infrastructure.
- Increasing lanes along the I-10 is the environmentally superior alternative to building brand new parallel freeways as it preserves an important regional riparian corridor and wildlife habitat.

So I urge you to follow the advice you have received and abandon the plans for a new highway and instead increase the lanes on I-10 for the reasons given above.

Sincerely yours,

John Alcock

Regents Professor at Arizona State University (retired)



June 11, 2019

Dear I-11 Tier 1 EIS Study Team c/o ADOT Communications:

As the educational board of Palo Verde Elementary School District, a school district that could be directly impacted by the construction of Interstate 11, we are voicing our strong objections to the Arizona Department of Transportation's and the Federal Highway Administration's preferred Blue corridor. We are concerned with the negative consequences that our school, students, and community would sustain if this route is designated, and we feel an alternative route would be more economically sound and safer for our children.

The preferred Blue route is shown to cut directly through thousands of acres of farmland and family homes. Besides dramatically decreasing our state's agricultural production, this route, then, has the potential to displace thousands of families and students in our community and in other rural communities near us.

The Blue route also shows the Interstate passing directly north of Palo Verde School. This raises serious concerns about the health and safety of our students. The EPA states that all those who live, work, or attend school near a major roadway – but especially children -- have an increased risk of serious conditions such as asthma, impaired lung development, cardiovascular disease, childhood leukemia, and even premature death. Choosing the Blue route, especially when other potential routes are available, would put our children at undue risk of great harm.

Recently, several studies have also been cited showing that students who move to areas higher in pollution exhibit a decline in test scores and an increase in both behavior problems and absenteeism. In the case of the Blue route currently preferred by the Department of Transportation, students would not be moving toward pollution; we would be moving the pollution to them! The majority of our students already qualify for free or reduced lunch – a criteria used by the Department of Education to flag at-risk students -- yet both they and our staff work tirelessly to meet state standards and outperform schools with similar low-income populations. When better options are available, why would the state choose to put our students at an even greater academic risk?

The proposed Blue route for the new Interstate 11 freeway would cost our community and our state too much economically. More importantly, it could cost our families, and especially our children, both physically and academically. In place of the Blue route, the alternative Orange route would save money, jobs, and stability, and it would ensure better health for our children and our community. The Orange route proposes that Interstate 11 follow existing freeways and highways instead of building new ones from scratch. Because the state would not have to build brand-new infrastructure, this has the potential to save millions of taxpayer dollars. Using the existing roadways indicated by the Orange route would also save countless family homes, eliminating the need for thousands to move and rebuild due to displacement. It would also prevent loss of income for family farmers and their workers, both of whom would lose homes and jobs were the proposed Blue route to be chosen. Finally, the alternative Orange route would stay many miles from our school campus, keeping our children safe and free from the potentially debilitating effects of roadway pollution. This will not happen with the Blue route.

We urge you to no longer consider the Blue route for Interstate 11 as a viable option. It is too costly and too damaging to our community and our children. Instead, please consider the Orange route as the preferred route.

Most sincerely,

Todd Hall

Harriett Johnson

Curtis Harris

Bill McLaughlin

Cutter Holt

<https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health>
<https://www.citylab.com/environment/2019/02/air-pollution-kids-health-data-school-academic-test-scores/581929/>
<https://www.npr.org/2018/08/27/642321572/scientists-link-air-pollution-exposure-to-cognitive-decline>
<https://www.chalkbeat.org/posts/us/2019/02/25/pollution-harm-schools-research/>



**Coalition for
Sonoran Desert Protection**

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 ✉ sonorandesert.org

Arizona Center for Law in the Public Interest ✉ Arizona Native Plant Society ✉ Bat Conservation International ✉ Cascabel Conservation Association ✉ Center for Biological Diversity ✉ Center for Environmental Ethics ✉ Defenders of Wildlife ✉ Desert Watch ✉ Environmental Law Society ✉ Friends of Cabeza Prieta ✉ Friends of Ironwood Forest ✉ Friends of Madera Canyon ✉ Friends of Saguaro National Park ✉ Friends of Tortolita ✉ Gates Pass Area Neighborhood Association ✉ Genius Loci Foundation ✉ Native Seeds / SEARCH ✉ Protect Land and Neighborhoods ✉ Safford Peak Watershed Education Team ✉ Save the Scenic Santa Ritas ✉ Sierra Club – Grand Canyon Chapter ✉ Sierra Club – Rincon Group ✉ Sky Island Alliance ✉ Society for Ecological Restoration ✉ Southwestern Biological Institute ✉ Tortolita Homeowners Association ✉ Tucson Audubon Society ✉ Tucson Herpetological Society ✉ Tucson Mountains Association ✉ Wildlands Network

July 4, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg*. We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection and the undersigned organizations.

Overview

In summary, we are in strong opposition to the Recommended Alternative route identified in the I-11 Tier 1 DEIS (“DEIS”). Our opposition is rooted in the major negative environmental and economic impacts that would inevitably occur if the Recommended Alternative route is successfully built and our belief that other transportation alternatives, including improving and expanding existing interstates, a focus on multi-modal solutions, and the inclusion of expanded rail service, could more effectively achieve the goals identified in the DEIS.

The Recommended Alternative route would have grave and devastating impacts to Pima County that cannot be adequately mitigated. These include:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation’s Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County’s Conservation Lands System.
- Impacts to planned mitigation lands for Pima County’s Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

- Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona's Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.
- Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water's CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- Impacts to Tucson's businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
- Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
- Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.

We believe that these impacts cannot be adequately mitigated.

Purpose and Need

First and foremost, we strongly believe that ADOT and FHWA have failed to clearly and thoroughly demonstrate the need for construction of an entirely new freeway, based on the best available science and data. ADOT and FHWA should analyze not only the most current transportation and growth models and current and projected traffic volumes, but also changing transportation modes. For example, if the Mariposa Point of Entry was fully staffed and operational 24 hours a day (which it currently is not), the currently required overnight parking would be reduced, spreading out traffic volumes throughout the day (and also decreasing air pollution since refrigerated trucks have to stay running all night long while they are parked), and negating the need for this proposal at all. Additionally, autonomous truck testing is currently occurring in southern Arizona, is expected to continue, and could safely accommodate truck traffic at night or in a designated lane.¹

The following planned projects should be analyzed by ADOT and FHWA:

- Plans to continue widening Interstate 10.

¹ <https://www.wired.com/story/embark-self-driving-truck-deliveries/>
https://tucson.com/business/pcc-tusimple-team-up-to-offer-self-driving-truck-operations/article_fb05bf3e-ba44-5dfd-ab23-dd6975cd509a.html

<https://www.tucsonweekly.com/tucson/hands-off-the-wheel/Content?oid=25111164>

- Elements of ADOT's 2017-2021 Five Year Plan to include, but not be limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.
- ADOT's 2011 "State Rail Plan," which was developed to address the needs of both freight and passengers.²

Also, of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of \$54 million secured in a highway grant for ADOT's I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation's competitive FASTLANE program. Tucson Mayor Rothschild said, "Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that's very good news for Tucson, Phoenix and the state as a whole."³

Concerns with the overall NEPA process

We have serious concerns about the larger NEPA process and the premature identification of a "Recommended Alternative" route without adequate scientific and economic analysis and environmental studies. We question the ability of the involved agencies to present thorough information to the public about the myriad impacts of the Recommended Alternative route, and other considered alternatives, given the inadequate analysis presented in the DEIS. **We fully support and incorporate by reference the full comments on the I-11 DEIS submitted by the National Parks Conservation Association in July 2019, including a more detailed analysis on this issue.**

Major Environmental Impacts from the Recommended Alternative Route

Impacts to Federal and Local Protected Areas

The Recommended Alternative route would have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the significant biological and cultural resources they contain. The Recommended Alternative route would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County's federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan, which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and *mitigation lands in Avra Valley are critical to its long-term success with special emphasis on riparian areas*. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014, and this HCP is currently under

² See: <https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0>. This rail plan was based off of this study completed in 2010: <https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0>

³ See <http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

review. Meanwhile, Tucson Water's operations in Avra Valley are planned and conducted as if the HCP is already in full effect. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are as important to consider as federal conservation lands in Pima County. Unfortunately, impacts to local conservation lands have not been adequately addressed and analyzed in the documents related to this process, including the DEIS. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their federal Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are in Avra Valley and directly in the path of the Recommended Alternative route. It is disappointing to see a total lack of acknowledgement of these important local conservation lands in the DEIS and in recent public presentations and materials - any review of environmental impacts should address impacts to local conservation lands in detail, particularly in light of the fact that these protections are a result of a federal Incidental Take Permit.

Impacts to Wildlife Linkages

The Recommended Alternative route would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.⁴

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the

⁴ Arizona Wildlife Linkages Assessment: <https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>

Pima County Wildlife Connectivity Assessment:
http://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf

isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, wildlife genetic health, and overall ecosystem resilience in this area.

Impacts to local wildlife linkages are not adequately addressed in the DEIS and adequate mitigation for impacts resulting from the Recommended Alternative route are not possible.

Impacts to Pima County's Conservation Lands System

The Recommended Alternative route would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. **We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS are not adequately addressed in the DEIS. The Recommended Alternative route would damage CLS mitigation lands to such an extent that the integrity of Pima County's federal ITP permit would be compromised. Again, adequate mitigation for these impacts is not possible.**⁵

Impacts to Riparian Habitat

The Recommended Alternative route would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest

⁵ Pima County's Conservation Lands System Map and Policies:

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf

The full text of the MSCP, Annual Reports, maps, and other important information can be found at:
<http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=52674>

More information on Pima County's Sonoran Desert Conservation Plan can be found at:
http://webcms.pima.gov/government/sustainability_and_conservation/conservation_science/the_sonoran_desert_conservation_plan/

region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

“Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state.”⁶

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS’s IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

The lack of consideration of the certainty of flooding in the Altar and Avra Valleys and the subsequent isolation of people and properties from public health and safety responders, not to mention the potential costly relocation of existing infrastructure for the CAP canal, Tucson Water, Marana Water and other regional water providers, numerous El Paso/Kinder Morgan boosting stations, and various electric utility substations is just one example of the flawed NEPA process. This woeful lack of analysis of social, cultural, scientific and economic impacts in the choice of an alternative without adequate due diligence is negligent and should be considered a fatal flaw. This DEIS puts the cart before the horse and would have dire consequences for the region.

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally “endangered” or “threatened,” those identified by the state of Arizona HabiMap (www.habimap.org) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima

⁶ http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf

County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

Aberts towhee
Bell's vireo
Western burrowing owl
Cactus ferruginous pygmy-owl
Western yellow-billed cuckoo
Swainson's hawk
Rufous-winged sparrow
Giant spotted whiptail
Tucson shovel-nosed snake
Pima pineapple cactus
Nichol turk's head cactus
California leaf-nosed bat
Mexican long-tailed bat
Pale Townsend's big-eared bat
Lesser long-nosed bat
Merriam's mouse
Jaguar
Ocelot

Specific impacts to the Tucson shovel-nosed snake

The Tucson shovel-nosed snake (*Chionactis annulata klauberi*) is a small colubrid adapted to the sandy loams of the northeastern Sonoran Desert region of central and southeastern Arizona. It was petitioned for listing as “threatened” or “endangered” under the US Endangered Species Act (ESA) based on its habitat specialization in sandy desert flats subject to agricultural conversion and urban sprawl and its disappearance from the Tucson region (Center for Biological Diversity 2004). The subspecies was defined based on the strong infusion of black pigment on the red crossbands, which may enhance both coral snake mimicry and background-matching via flicker-fusion (Mahrdt et al. 2001). Its geographic range was described by Klauber (1951) and Cross (1979) and additional genetic analysis by Wood et al. (2008, 2014) supported continued recognition of the subspecies but did not define its distributional limits.⁷

⁷ Mahrdt, C.R.; Beaman, K.R.; Rosen P.C.; [et al]. 2001. *Chionactis occipitalis*. Catalog of American Amphibians and Reptiles. 731: 1–12.

Klauber, L.M. 1951. The shovel-nosed snake, *Chionactis* with descriptions of two new subspecies. Transactions of the San Diego Society of Natural History. 11: 141–204.

Cross, J.K. 1979. Multivariate and univariate character geography in *Chionactis* (Reptilia: Serpentes). Dissertation. Tucson, AZ: The University of Arizona. 517 p.
http://arizona.openrepository.com/arizona/bitstream/10150/298514/1/azu_td_7916875_sip1_m.pdf [accessed February 2, 2018].

In 2014 the U.S. Fish and Wildlife Service rejected the snake for ESA listing based on an incorrect range map for the subspecies that included geographic areas within a sister taxon, *C. a. annulata* (USFWS; 2014). In 2018, Bradley and Rosen (in press) produced a more accurate distribution model for the species based on published genetic and distributional data (Figure 1).⁸ They found that 39% of its habitat has been lost to urban development and agriculture and the remaining habitat is in geographically isolated pockets with no genetic connectivity to each other.

The I-11 Recommended Alternative route would have dire consequences for the remaining population of the Tucson shovel-nosed snake through road strikes and further habitat fragmentation. The highway would bisect some of the last intact habitat for the subspecies, including occupied territory within the Avra Valley. Another example of this is evident in the areas between Gila Bend and Maricopa, within and adjacent to the Sonoran Desert National Monument. This has been a reliable place to still see the snake and several individuals have been recorded along highway 238. The Recommended Alternative route would cut through this habitat block and this area would become a population sink as snakes and other wildlife, venturing outside of the monument, would be crushed by trucks and cars.

Further analysis of impacts to the Tucson shovel-nosed snake needs to be completed by the agencies to adequately understand the impacts of corridor alternatives.

Wood, D.A.; Meik, J.M.; Holycross, A.T.;[et al.]. 2008. Molecular and phenotypic diversity in the Western Shovel-nosed snake, with emphasis on the status of the Tucson Shovel-nosed snake (*Chionactis occipitalis klauberi*). *Conservation Genetics*. 9: 1489–1507.

Wood, D.A.; Fisher, R.N.; Vandergast, A.G. 2014. Fuzzy Boundaries: Color and Gene Flow Patterns among Parapatric Lineages of the Western Shovel-Nosed Snake and Taxonomic Implication. *PLoS ONE* 9(5): e97494.

⁸ U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office. 2014. Species Status Report for the Tucson Shovel-Nosed Snake. [Online]. 78 p. Available: <https://www.regulations.gov/document?D=FWS-R2-ES-2014-0035-0002>.

Bradley, C.M. and Rosen, P.R. In Press. Defining suitable habitat and Conservation Status for the Tucson shovel-nosed snake (*Chionactis annulata klauberi*) in the Sonoran Desert. *Biodiversity and Management of the Madrean Archipelago IV conference proceedings*.

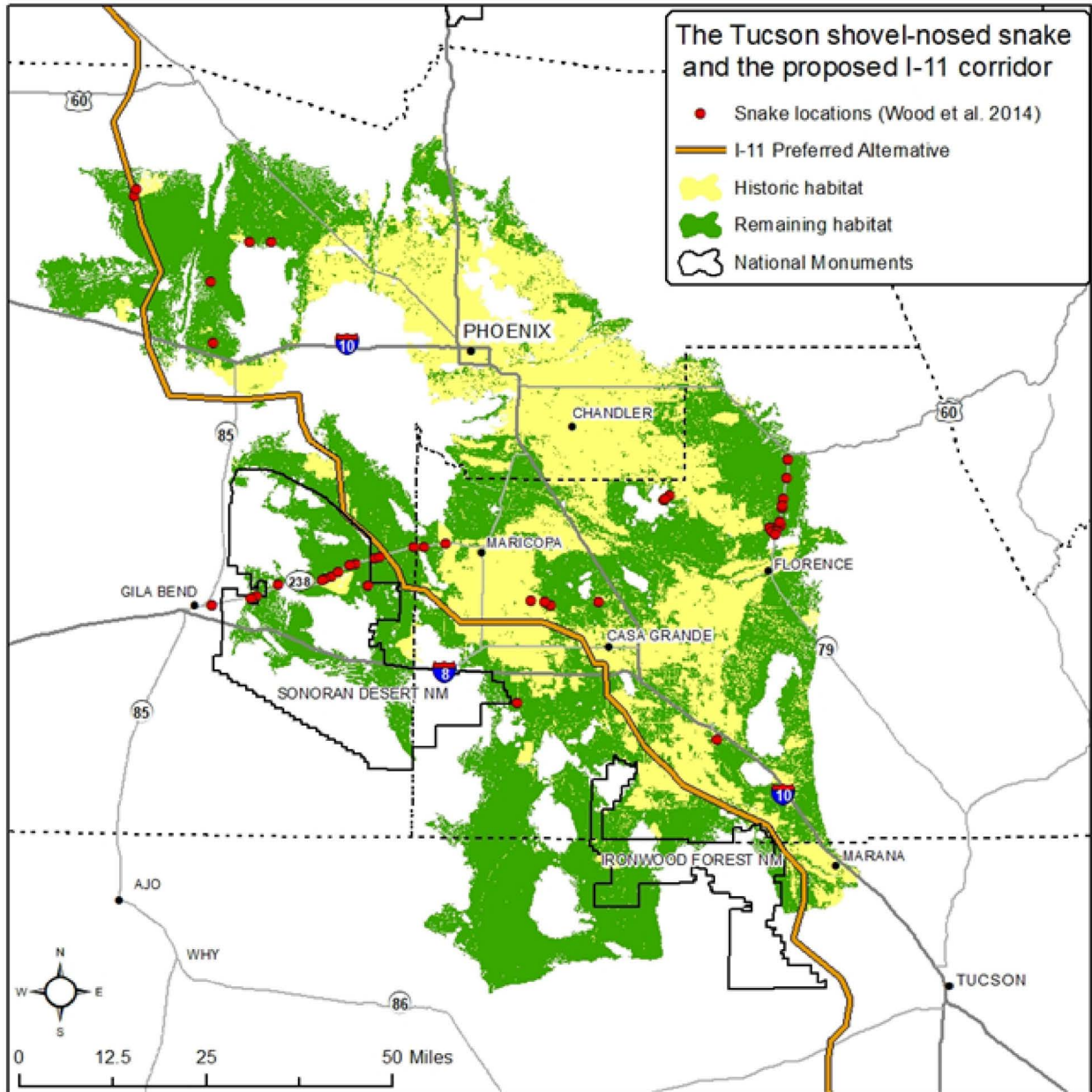


Figure 1: Historic and remaining habitat for the Tucson shovel-nosed snake and the I-11 Recommended Alternative route.

Impacts from noise and light pollution

The Recommended Alternative route would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they use through noise and light pollution. The Recommended Alternative route would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights, street lighting, and from reasonably foreseeable future commercial and residential development.

Impacts to the economy

The Recommended Alternative route runs adjacent to some of southern Arizona's long-standing economic powerhouses, such as the Arizona-Sonora Desert Museum, Saguaro National Park West, and Old Tucson. It also comes perilously close to emerging economic engines such as Ironwood Forest National Monument.

A May 28, 2019 press release directly from Saguaro National Park and the National Park Service stated that, "957,000 visitors to Saguaro National Park in 2018 spent \$62.1 million in communities near the park. That spending supported 866 jobs in the local area, \$31.3 million in labor income and had a cumulative benefit to the local economy of \$90.9 million dollars." The Recommended Alternative route is located within 1,300 feet of the boundary of Saguaro National Park and will have unmitigable impacts on the visitor experience, including increased noise, light, haze and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of viewsheds. None of these impacts can be adequately mitigated.

The Recommended Alternative route is also located within 400 feet of the boundary of Ironwood Forest National Monument, an increasingly popular national monument supported by a robust and active group of volunteers and land managers. A new visitor kiosk was recently installed at IFNM at the Agua Blanca portal and the annual "Meet the Monument" event grows every year, with increasing numbers of participants every year. Building a freeway next to these protected public lands would cause irreparable harm to a place that is gaining momentum and actively investing in the visitor experience.

On April 17, 2019, local newspaper the AZ Daily Star reported on a recent U.S. News and World Report article that identified the Arizona-Sonora Desert Museum as one of the best 30 zoos nationwide. The Recommended Alternative route is located within approximately a half-mile of the Arizona-Sonora Desert Museum. Construction of this route would cause increased noise, light, and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of the viewshed at the museum. None of these impacts can be adequately mitigated.

The Recommended Alternative route would also drive traffic AWAY from Tucson's downtown and growing business districts that rely on traffic from I-19 and I-10 to survive. The City of Tucson resolution adopted unanimously by the Mayor and Council on June 19, 2019 clearly states opposition to the Recommended Alternative route and includes the following statements:

"...Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods.

...Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination.

...In April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district.

...Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics.

...Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations.

...[The] cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson.

...[The] state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions - by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic."

These are all economic arguments for either the No Build alternative or co-locating I-11 with I-19 and I-10 and demonstrate the grave economic consequences to the City of Tucson from the Recommended Alternative route. It is impossible to mitigate for these impacts to Tucson's economy and water supply.

Last, the DEIS needs to improve its analysis of the far-reaching impacts to local governments from building a brand-new freeway in a currently rural area. The Recommended Alternative route would lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other infrastructure and services, the cost of which would likely be borne by local governments such as the City of Tucson, Town of Marana, and Pima County.

Cost of considered alternatives

Our interpretation of the cost of considered alternatives in the DEIS indicates that the Recommended Alternative route would cost approximately \$3.4 billion MORE to construct than the Orange Alternative that co-locates I-11 with I-19 and I-10 in the Tucson region. This estimate is based on information in Table 2-8 on page 2-33 of the DEIS. For Section A-F2, the Green Build Alternative construction costs are estimated to be \$3,998,431,000 and the Orange Build Alternative construction costs are estimated to be \$585,899,000. This leads to the conclusion that it will cost approximately \$3.4 billion more to construct the Green Build Alternative. **We are also unclear why the DEIS does not clearly outline the costs of the Recommended Alternative route (blue on maps), rather leaving it up to the reader to somehow interpret the costs from the other identified routes and where they overlap with**

the Recommended Alternative route. The public should be given clear information for comparison and not be left to make unsure inferences from the incomplete data presented.

One other example of where the DEIS states the costs of considered alternatives in a confusing and incomplete way is in the following section:

Errata 4.5.3

Tunneling – Placing portions of the proposed Project in a tunnel was considered in the property-specific avoidance analysis (Section 4.4.3) as a means to avoid potential impacts to clusters of properties and Historic Districts. FHWA determined that tunneling could result in a use of one or more Section 4(f) properties and, therefore, is not an avoidance alternative. However, even if a way of avoiding use of Section 4(f) properties were to be found, the cost estimate for placing I-11 in a tunnel in Downtown Tucson is approximately \$3.5 to \$5.1 billion, compared to \$240 million for the at-grade concept and \$1 billion for the elevated concept. The extraordinary cost for tunneling indicates that, while tunneling may be feasible, it is not prudent (Avoidance Analysis Factor 4).
Elevated Structures – Elevating I-11 in Downtown Tucson to avoid impacting Section 4(f) properties was considered in the property-specific avoidance analysis (Section 4.4.3.2 and 4.4.3.3). Although the elevated lanes could avoid direct impacts on adjacent Section 4(f) properties, noise and visual impacts would result in adverse effects to historic buildings and structures. Deep excavations for the elevated structure foundations would impact archaeological resources. For these reasons, an elevated lanes alternative through Downtown Tucson is not an avoidance alternative. The elevated alternative also would impact businesses and residences that are not protected by Section 4(f) and would add \$1 billion to the overall capital cost of the Orange Alternative.

It is unclear what specifically the “\$240 million” is referring to in terms of the specific section of highway considered for an at-grade concept. It should also be noted that even though \$1 billion was added to the Orange Alternative in order to elevate I-11 through downtown Tucson, the capital costs would still be \$2.4 billion LESS than the Recommended Alternative route.

In general, we are disappointed with the presentation of the cost of considered alternatives - they are difficult to interpret and should be more clearly and conclusively discussed so compared costs of alternatives are clear to the reader. The examples highlighted above are not exhaustive by any means and we recommend a thorough overhauling of this entire section of the DEIS.

Inadequate 4(F) analysis

The comparison between impacts to the Tucson Mitigation Corridor (TMC) and impacts to the seven historic properties likely to be used if the Orange Alternative is chosen are inadequate as presented in the DEIS.

Use of programmatic “net benefit” evaluation for TMC is inappropriate

Conducting a “net benefit” programmatic evaluation of the proposed use of the TMC is completely inappropriate for this 4(f) property. First, the federal regulations that govern 4(f)

evaluations make clear that the use of programmatic evaluations like the “net benefit” evaluation are to be used only “for certain minor uses of Section 4(f) property.” (23 CFR 774.3(d)) Additionally, per agency guidance, the “net benefit” must be realized on the 4(f) property itself; promising off-site mitigation to offset impacts to a 4(f) property is not the same thing. According to FHWA guidance, a “‘net benefit’ is achieved when the transportation use, the measures to minimize harm, and the mitigation incorporated into the project results in an overall enhancement of the Section 4(f) property... A project does not achieve a “net benefit” if it will result in a substantial diminishment of the function or value that made the property eligible for Section 4(f) protection.”⁹

There is simply no way to achieve a “net benefit” on this 4(f) property, as the use proposed here will, without a doubt, diminish - if not entirely undermine - the ability of the TMC to provide landscape connectivity for wildlife movement. This is especially true considering that this property is itself serving as mitigation for a previous linear project that impacted landscape connectivity in this same area. Regardless of the off-site mitigation promised, it is unlikely that this property will be able to continue to serve as mitigation for that previous project, should this proposed use be approved. **For these reasons, the use of the “net benefit” evaluation for the TMC is simply indefensible. The agencies should conduct an individual evaluation on the TMC property and revise the entire *Draft Preliminary Section 4(f) Evaluation* to consider that individual evaluation.**

Assessment of 4(f) property uses relies on inconsistent information

Because the agencies relied on the incorrect assumption that a “net benefit” would be achieved for the TMC 4(f) property, the DEIS provides no information whatsoever on the actual impacts that may be inflicted on the TMC. No baseline information on the TMC is provided and no information on potential impacts is provided. Without this information, there is no way for the reader to understand what a “net benefit” even means in this context; thus, it is inappropriate to leave this information out. However, because net benefit is inappropriate, it is imperative that the EIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

For example, Google imagery does not provide adequate information for assessing historic integrity and architectural significance for numerous reasons, and there are other far more valid approaches to evaluating such properties that the agencies could have used instead. Acknowledging one of the many pitfalls of this approach, the DEIS admits that “many [properties] were classified as possibly eligible simply because the Google imagery did not provide a clear view.”

In addition, the DEIS is inconsistent in analyzing the costs and feasibility of tunneling through downtown Tucson but does not include a similar analysis of the costs and feasibility of tunneling under the entire 4(f) Tucson Mitigation Corridor.

⁹ “Section 4(f) Evaluation and Approval for Transportation Projects that Have a Net Benefit to a Section 4(f) Property.” Federal Highway Administration Environmental Review Toolkit.
https://www.environment.fhwa.dot.gov/legislation/section4f/4f_netbenefits.aspx.

The DEIS is inconsistent in how it presents information related to the assessment of 4(f) properties. One example of this can be found in a comparison of how information regarding the TMC is represented versus how information regarding the downtown Tucson historic properties is represented. While it is technically true that 15% of the TMC acreage would be within the build corridor (453 out of 2958 acres), far more than just 15% would actually be impacted, considering the purpose for which the TMC was designated (providing landscape connectivity for wildlife movement). In contrast, the EIS asserts that 100% (3 of 3 acres) of the Manning House would be “used;” however, the document goes on to say, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” (EIS at 3.7-24.) Therefore, while 100% of this historic property would be within the corridor, the EIS makes clear that the impact is not 100%. However, with the TMC no parallel consideration of actual impacts is given.

Reliance on insufficient information to compare each Alternative’s potential use of 4(f) properties.

Agencies are required to “identify any methodologies used and shall make explicit reference... to the scientific and other sources relied upon for conclusions in the statement.” (40 CFR 1502.24.) It has long been established that agencies must articulate “a rational connection between the facts found and the choice made.” *Motor Vehicle Mfrs. Ass’n of the U.S. v. State Farm Mut. Auto Ins. Co.*, 463 U.S. 29, 43 (1983).

The flaws resulting from the “net benefit” assumption for TMC aside, the validity of some of the information used to inform the comparison of 4(f) properties is extremely questionable. The information provided for each property is insufficient, in some cases contradictory, and is undermined by inadequate, contradictory information about the properties being compared, and using different metrics.

Scope and Intensity of Impacts to 4(f) properties potentially impacted by Orange Alternative are artificially inflated, while no corollary information is provided for the 4(f) property potentially impacted by the Purple and Green Alternatives.

The DEIS’s comparison of the number of 4(f) properties and their potential use under each alternative is confounding to the reader, precluding meaningful analysis.

Table 4-4 provides the percentage of each 4(f) property located within a build corridor for the various alternatives. However, this information seems to contradict information in the text, causing confusion regarding how potential use of each property is being assessed. This results in a significantly problematic apples-to-oranges comparison of the potential use of each property that tells the reader virtually nothing about the actual potential use of each 4(f) property.

For example, the potential use of the Manning House in downtown Tucson is unclear. First, the property description is inconsistent from one section to the next; on table 4-4 it is described as 1 acre in size, but on table 4-4 it is described as 3 acres in size. Second, Table 4-4 estimates that 100% of the property is subject to “potential use,” but in the text on page 3.7-24 the DEIS

states, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” This indicates that the percentage of “potential use” is not the same as the percentage of the property potentially directly impacted, indicating that indirect impacts are part of the “potential use” consideration. Another example of this is Barrio Anita, where the percentage of the property subject to “potential use” is 85 percent. At the same time, the text states that out of 66 buildings identified in the Barrio Anita Historic District NRHP nomination, the Orange Alternative “could require land from four parcels with contributing residences along the west side of Contzen Avenue but not all of those houses might be directly affected” (EIS at 3.7-24). To make matters more confusing, elsewhere the text states, “The Orange Alternative could require... Removal of at least one historic residential structure adjacent to I-10 in Barrio Anita” (page 4-75). Again, the only explanation for the discrepancy between the percentage of potential use and the amount of land potentially directly impacted is that indirect impacts are considered in the percentage of potential use.

In contrast, the potential use of the TMC property does not appear to include indirect impacts. Table 4-4 shows that only 15% of the property is subject to potential use, with only the percentage of land directly impacted. However, the percentage of potential use would be far larger if indirect impacts are considered for this property, considering how severely compromised the TMC would be as a wildlife movement corridor if an interstate is routed along its entire western boundary or diagonally, from southeast to northwest, through the parcel. There is no explanation for why the TMC is not given the same consideration as the 4(f) properties it is being compared against.

Other discrepancies abound. Page 4-73 provides a list of seven 4(f) properties in downtown Tucson that are subject to potential use by the Orange Alternative, which includes the Barrio Anita Historic District and the David G. Herrera and Ramon Quiroz Park (formerly Oury Park). The analysis uses this number to compare the Orange Alternative’s potential impacts to 4(f) properties to those of the Purple and Green Alternatives, where only one property -- the TMC -- is subject to potential use. However, the text makes clear that Quiroz Park is a contributing property to the Barrio Anita Historic District, and the Park is not listed separately on Table 4-2 or Table 4-4. Inadvertently or otherwise, listing Quiroz Park separately only in this context artificially increases the number of properties potentially impacted by the Orange Alternative and skews the comparison with the Purple and Green Alternatives.

Information provided in Least Harm Analysis is so inadequate it precludes meaningful analysis

Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property

When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, “There is a low ability to mitigate the impacts of the Orange Alternative.”

In addition, on page 4-108 the DEIS states, “After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable...” Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation.

On page 4-96, the DEIS states, “As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property.” This statement explicitly demonstrates skewing of the comparison.

Least harm analysis Factor 3: Relative significance of each Section 4(f) property

The DEIS asserts the following on page 4-97, “FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value.” We strongly disagree with this outlandish statement and urge further evaluation of all Section 4(f) properties. This statement asserts that the entire Tucson Mitigation Corridor is equal to the parking lot of the Manning House, which is a ridiculous and erroneous assertion to make.

Least harm analysis Factor 6

Section 4(f) properties are defined in part as “*publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site).*” The Ironwood Forest National Monument was designated by Presidential Proclamation in June of 2000, under a new protective classification of federal Bureau of Land Management lands. We disagree with the conclusion in the DEIS (Appendix F) that fails to recognize Ironwood Forest National Monument as a Section 4(f) property.

Furthermore, the DEIS fails to consider the magnitude of adverse impacts on multiple properties not protected by Section 4(f). For example, for the Purple and Green Alternatives, this analysis must include the Ironwood Forest National Monument (see above), Tucson Mountain Wildlife Area, and Sonoran Desert National Monument. We believe these properties should be considered as 4(f) properties. However, even though these properties are not considered 4(f) properties, this does not mean there are no adverse impacts to them.

Consideration of other transportation strategies

The DEIS and the choice of the Recommended Alternative route overlooks other less costly options that would encourage the free flow of goods through our region. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;

- Technologies that improve traffic flows;
- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

During the Scoping phase, we strongly recommended a more thorough analysis and consideration of these other transportation strategies that will also better equip our region to adapt to the growing impacts of climate change. Assessing the cumulative impacts of these options on congestion also needs to be more thoroughly considered in the DEIS. **We reiterate our request for this more thorough analysis in future planning efforts and this analysis be completed and shared with the public prior to designating a Preferred Alternative.**

Additional necessary studies

The following studies must be completed prior to designating a Preferred Alternative, with the results communicated to the community and incorporated into the decision process early on:

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the Recommended Alternative route. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Brawley/Los Robles wash system and Santa Cruz River.
- Social and economic equity impacts.

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any Recommended Alternative route. Furthermore, we strongly encourage ADOT and FHWA to refer to the “I-11 Super Corridor Study” final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and the University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Using such studies and designs would help us reduce impacts in Tucson's downtown and surrounding areas should co-location be further considered.

Other factors that must be more thoroughly analyzed for all corridor alternatives include how continued climate change, which is a reasonably foreseeable circumstance, will impact Arizona's water resources and projected population growth; public health implications,

including increased air pollution and the proliferation of valley fever; and long-term impacts on local and regional land-use plans.

The Recommended Alternative route through Avra Valley would facilitate commercial and residential development in this area. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.

Considering the identified Recommended Alternative route in the DEIS, we argue that either the No Build alternative or improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental and larger community impacts. **Because of this, we stand in strong opposition to the Recommended Alternative route.**

Local government opposition

In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 (attached) opposing “the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.” Additionally, the Board called for the expansion of “capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.”

Additionally, in April 2019 Pima County Board of Supervisors’ Chair Richard Elías and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, “The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through ‘invaluable Sonoran Desert areas.’ That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it” (attached). We strongly concur with Pima County’s elected officials and their resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, “The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction

of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately mitigated and that are contrary to the interstate design standards and criteria that must be applied to the project.”

On May 18, 2019, Arizona District 3 Congressman Raúl Grijalva submitted comments on the DEIS voicing his opposition to the Recommended Alternative route. We have attached the Congressman’s letter as well.

Thank you for the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. **Given the far-reaching and devastating impacts that the Recommended Alternative route would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, we express our strong opposition to the Recommended Alternative route and feel that should additional capacity be warranted, that reconfiguration of existing highways is the only acceptable Alternative. This DEIS is replete with inadequate analyses and is, in and of itself, a fatal flaw.** We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jodi Netzer, Director
Tucson Entrepreneurs

Robin Clark *for*
Avra Valley Coalition

Tom Hannagan, President
Friends of Ironwood Forest

Louise Misztal, Executive Director
Sky Island Alliance

Barbara Rose, Project Coordinator
Safford Peak Watershed Education Team

Diana Hadley, Co-President
Northern Jaguar Project

Demion Clinco, President
Tucson Historic Preservation Foundation

Sandy Bahr, Chapter Director
Sierra Club - Grand Canyon Chapter

Meg Weesner, Chair
Sierra Club - Rincon Group

Emily Yetman, Executive Director
Living Streets Alliance

Kevin Gaither-Banchoff, Development
Director
WildEarth Guardians

Peter Chesson, President
Tucson Mountains Association

Gayle Hartmann, President
Save the Scenic Santa Ritas

Robert Villa, President
Tucson Herpetological Society

Terry Majewski, Chair
Tucson-Pima Historical Commission

Ivy Schwartz, President
Community Water Coalition of Southern
Arizona

Jonathan Lutz, Executive Director
Tucson Audubon Society

Nancy Williams, President
People for Land and Neighborhoods

Fred Stula, Executive Director
Friends of Saguaro National Park

Pearl Mast and Anna Lands, Co-Chairs
Conservation Committee
Cascabel Conservation Association

Randy Serraglio, Southwest Conservation
Advocate
Center for Biological Diversity

Myles Traphagen, Borderlands Project
Coordinator
Wildlands Network

Gary Kordosky, President
Gates Pass Area Neighborhood Association

Della Grove, President
Citizens for Picture Rocks

Jessica Moreno, President
Arizona Chapter of The Wildlife Society

Mike Quigley, Arizona State Director
The Wilderness Society

Robert Peters, Southwest Representative
Defenders of Wildlife

Attachments: April 2019 Memo from Pima County Supervisors Richard Elías and Sharon
Bronson
Pima County Resolution No. 2007-343
City of Tucson Resolution No. 23051
May 2019 Letter from Rep. Raúl Grijalva (D-AZ)

ATTACHMENTS

April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson



PIMA COUNTY BOARD OF SUPERVISORS

130 WEST CONGRESS STREET, 11th FLOOR
TUCSON, ARIZONA 85701-1317

(520) 724-8126
district5@pima.gov
www.district5.pima.gov

To Whom it May Concern:

The Pima County Board of Supervisors adopted Resolution No. 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through "invaluable Sonoran Desert areas." That remains the official position of Pima County government.

At the time, the proposal under consideration was for an Interstate 10 Bypass Freeway, but it was along the same suggested routes as the currently proposed Interstate 11. A "favored" route then, as now, was through Avra Valley.

A freeway through the Avra Valley or other parts of the delicate Sonoran Desert is not compatible with the county's landmark Sonoran Desert Conservation Plan or with its Sustainability Plan to combat climate change in line with the 2015 Paris Agreement.

A freeway would destroy sensitive habitat for many of the 44 unique species of concern that the Conservation Plan protects. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn.

The Sustainability Plan aims to steer the county government operations away from fossil fuel use and dependency, and a new freeway would promote increased fossil-fuel use, to the detriment of our air quality as well as to climate change.

A freeway through Avra Valley would impact severely and negatively such jewels and tourist areas as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Arizona-Sonora Desert Museum. It would diminish vastly the quality of life of thousands of Avra Valley residents.

The cost of buying land for and building an entirely new freeway would be tremendous, when we do not have enough funds to maintain properly our existing roads and highways. It would cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

An Interstate 11 would divert traffic away from existing businesses that depend on Interstate 10 and Interstate 19 traffic visibility for their survival.

A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it.

Sincerely,

Richard Elías, Chairman
Pima County Board of Supervisors

Sharon Bronson, District Three Supervisor
Pima County Board of Supervisors

RESOLUTION NO. 2007- 343

**A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS IN
OPPOSITION TO CONSTRUCTION OF AN INTERSTATE HIGHWAY LINK
THAT BYPASSES TUCSON AND TRAVERSES PRISTINE AND INVALUABLE
SONORAN DESERT AREAS**

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

WHEREAS, Pima County has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel to this effort because of their greenhouse-gas and pollutant emissions, and therefore calls for the County to shift its fleet to use alternative fuels; and

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new controlled-access highway would be enormous, requiring the acquisition of thousands of acres of new rights of way, expenditures on high and rapidly increasing costs of concrete and asphalt, putting a tremendous burden on taxpayers and future highway users; and

WHEREAS, the production of the millions of tons of concrete and asphalt for this massive construction project would cause significant air pollution and greenhouse gas emissions, as would the operation of heavy machinery in the construction process; and

WHEREAS, a new controlled-access highway near or through Pima County on any route, would promote urban sprawl, causing local governments to incur large financial responsibilities for new infrastructure costs and force major changes to existing county land-use and zoning designations; and

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; and

WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

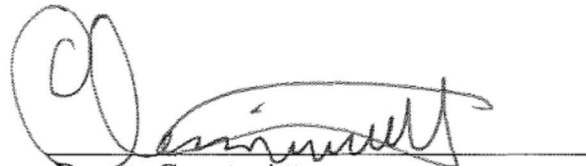
2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.


Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:


Clerk of the Board
Deputy County Attorney

ADOPTED BY THE
MAYOR AND COUNCIL

June 18, 2019

RESOLUTION NO. 23051

RELATING TO PUBLIC HEALTH AND SAFETY: DECLARING MAYOR AND COUNCIL'S OPPOSITION TO CONSTRUCTION OF A NEW INTERSTATE HIGHWAY THAT BYPASSES THE CITY OF TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS; AND DECLARING AN EMERGENCY.

WHEREAS, the City of Tucson (Tucson) works to advance goals of sustainability, equity, economic growth and vibrant, livable neighborhoods; and

WHEREAS, in November 2013 Tucson voters adopted Plan Tucson, the City of Tucson General Plan & Sustainability Plan; and

WHEREAS, Tucson has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel because of their greenhouse-gas and pollutant emissions; and

WHEREAS, Plan Tucson seeks to create, preserve, and manage biologically rich, connected open space; wildlife and plant habitat; and wildlife corridors, including natural washes and pockets of native vegetation, while working to eradicate invasive species; and

WHEREAS, an interstate highway in the Avra Valley would degrade the Sonoran Desert, sever wildlife corridors, impede washes and flood prone areas, open new areas to intense residential and commercial development

far from existing urban centers, and encourage more car and truck travel at time when climate change and air pollution are growing concerns; and

WHEREAS, Tucson strives to protect night skies from light; and

WHEREAS, Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods; and

WHEREAS, Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination; and

WHEREAS, in April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district; and

WHEREAS, Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics; and

WHEREAS, Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations; and

WHEREAS, the Interstate 11 Draft Tier 1 Environmental Impact Statement Recommended Alternative route would run through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park - West, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona

Project mitigation parcel, and severing linkages between important habitat areas and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson; and

WHEREAS the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions – by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately

mitigated and that are contrary to the interstate design standards and criteria that must be applied to this project.

SECTION 2. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City of Tucson that this Resolution become immediately effective, an emergency is hereby declared to exist and this Resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Tucson, Arizona, June 18, 2019.


MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM:

REVIEWED BY:

del 

CITY ATTORNEY

CITY MANAGER

MR/dg
6/13/19

RAÚL M. GRIJALVA
3RD DISTRICT, ARIZONA

COMMITTEE ON NATURAL RESOURCES
CHAIRMAN

COMMITTEE ON EDUCATION AND LABOR
HIGHER EDUCATION AND WORKFORCE INVESTMENT
SUBCOMMITTEE

CIVIL RIGHTS AND HUMAN SERVICES SUBCOMMITTEE

CONGRESSIONAL PROGRESSIVE CAUCUS
CHAIR EMERITUS

Congress of the United States
House of Representatives
Washington, DC 20515-0307

WEBSITE: <http://grijalva.house.gov/>

May 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

Also emailed to: I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Dear Mr. Van Echo,

I would like to take this opportunity to provide input during the public comment period on the Draft Tier 1 EIS referenced above.

I am concerned that the current comment period is too short for a comprehensive review of this extremely large document (762 pages plus appendices). I request that the comment period be extended for a total of 120 days—which is common for projects of this magnitude and controversy—making the revised due date for comments August 3, 2019.

I support efforts to physically connect Arizona and Nevada via transportation corridors to facilitate Canadian and Mexican trade routes. The City of Tucson and the metro region of Pima County would benefit most by enhancing existing infrastructure that already provides the connection: Interstate 10 and 19, or option “A” and “B” that have been included in your route studies.

I am **very concerned** that a hybrid option of routes going through Altar and Avra Valley has instead been chosen for the preferred alternative in the Draft Tier 1 EIS. This route would necessitate building new interstate. This route would negatively impact rural communities in Avra Valley, Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and other protected open spaces and wildlife corridors. I pointed this out during the scoping process in a June 1, 2017, letter to project manager Jan Van Echo. For the record I would like to repeat my concerns:

This proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values, and quality of life for residents of that community. Even a limited access roadway would still open this mainly undeveloped area to massive sprawl. Residents of my district affected by this option have called my office expressing these same concerns. Pima County voters have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, the Federal Highway Administration and the Arizona Department of Transportation must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concerns expressed

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FACEBOOK: [Facebook.com/Rep.Grijalva](https://www.facebook.com/Rep.Grijalva)
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INSTAGRAM: [Instagram.com/RepRaulGrijalva](https://www.instagram.com/RepRaulGrijalva)

all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

One explanation for this conclusion is that a Tier 1 analysis is not enough for a federal process to come up with the better route alternative. The tiering of the required environmental compliance means that the decision is not informed by the best information and that vague promises of future mitigation is enough to allow the incredible decision to bisect an important wildlife mitigation area with a major freeway. This calls into question the Department of Transportation's unusual practice of coming to a decision without the full environmental compliance that most other federal projects regularly require.

A proposed MOU giving the state environmental compliance responsibilities for federal highway projects in Arizona, which would include the Tier 2 study, further demonstrates the inappropriate fragmentation of planning and compliance this project will receive, especially compared to projects with this sort of impact on protected lands that our community would normally expect.

Another issue of concern is the regularity with which this route keeps re-surfacing. Voters overwhelmingly voted against a ½ cent sales tax that would have funded a similar project back in the mid-1980s. The Picture Rocks community along with many other Pima Country residents and organizations have and continue to vocally oppose it, yet this route keeps being promoted as the preferred option.

Very little is being done to address alternatives to continuous freeway expansion, such as facilitating the expansion and use of intermodal shipping yards, facilitating the creation of public rail transportation lines as alternatives to continuously promoting freeway development—especially in pristine habitat corridor areas. I consistently remain opposed to any highway plan that opens up the Avra valley to widespread environmental destruction.

The possible fast tracking of this project, despite information typically disseminated by the project's managers at public meetings that there is not current funding available, is concerning. While that may be currently true, this project is in conjunction with the Federal Highway Administration, I-11 and Intermountain West Corridor Study (IWCS) completed in 2014. With talk in Congress about developing an infrastructure spending package, the state appears to be attempting to remove all barriers to fast tracking this project once, and if, funding is available. If Congress is able to pass an infrastructure package, the voters will have no say, as planning will be completed, and routes will have been previously selected.

If the project's purpose is to provide a high-priority north to south transportation corridor to connect to major metropolitan areas and markets with Mexico and Canada, then I believe that the best option is using Interstate 10 and 19, which already includes metropolitan Tucson and protects the environmentally sensitive area west of Tucson.

Thank you for your time and the opportunity to provide input.

Sincerely,



Raúl M. Grijalva,
Member of Congress, (AZ-03)

Cc: Jan Van Echo, PE, ADOT I-11 Study Manager

I-11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson Street
Mail Drop 126F
Phoenix, AZ 85007

June 29, 2019

Subject: I-11 Tier 1 Study

I-11 Tier 1 Study Team,

We are residents of Vista Royale, a residential development seven miles northwest of Wickenburg along Highway 93. We, along with many of our neighbors, attended the Tier 1 Study presentation in Wickenburg on April 30, 2019. Our reaction to the Study's recommended corridors T and U was one of stunned disbelief. These corridors would be just west of our development—in our back yard! One of the wonderful things about Vista Royale is our access to the State Trust Land to the west of us. Many of the development's residents enjoy using this beautiful desert area for hiking, biking, horseback riding, wildlife watching, ORV activities. The proposed corridors would block our access to this wonderful desert environment. In addition, this routing of I-11 would block our view to the west and bring all the noise that goes with a freeway. The months-long (years?) construction period happening so close to us would be devastating. The attendant noise and dust could have terrible effects on our health and wellbeing. Many of us are senior citizens. There is also every reason to expect our property values to be adversely affected.

At the Study presentation, we talked to EIS representatives there, who told us that these proposed corridor routings were created in response to a request by the town of Wickenburg to have I-11 come "as close as possible" to Wickenburg. Then-mayor Sickles was in attendance at the Study presentation, and we talked to him about this. He said that the proposed routing of I-11 so near Vista Royale was not the town of Wickenburg's desire at all. During the taking of public comments, Mayor Sickles said as much. The town council later passed Resolution 2229 in an attempt to clarify the council's position.

Many residents of Vista Royale were upset by the proposed I-11 routings and a Vista Royale I-11 Study Team was created, along with a website

www.ProtectOurWickenburgLifestyle.com. The goal of this activity is to get the I-11 corridor moved as far west as possible.

We don't understand why there is no serious consideration for routing I-11 along Highway 60 to Highway 71 to Highway 93. This would make use of existing highway rights of way and would have the least impact on our beautiful but fragile desert lands.

If the 60/71/93 routing is not feasible, we strongly urge the Study team to consider what is being called "VR2" on the above mentioned website in order to minimize the impact on the residents of Vista Royale.

Thank you for your consideration in this matter.

The image shows two handwritten signatures in black ink. The signature on the left is 'Bobbie Allen' and the signature on the right is 'Jim Allen'.

Bobbie and Jim Allen

35800 S Gold Rock Circle
Wickenburg, AZ 85390
bjallenwa@gmail.com
480-532-6410



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

I am not persuaded by the arguments for building I-11 through Avra Valley. It seems that taxpayers are essentially being asked to foot a massive construction bill that will not serve our interests. Planning for future interstate traffic is important, but expanding I-10 would surely be a cheaper and more useful option. I-11 in Avra Valley will merely reduce truck traffic, but this is not the prime source of vehicle congestion. Further, self-driving trucks will likely make it easier to pack many trucks into small amounts of road space. An Avra Valley freeway does not serve commuter needs in Tucson. It is also ecologically problematic. It appears that I-11 will only benefit developers in Avra Valley and contribute to sprawl and future traffic congestion. Expand I-10 or do not build, but don't ask us to bankroll such a wasteful project.

Contact Information (optional)

Name David Anderson Email flak@wastuga.com
 Address 1 N. Tucson Terrace
 City Tucson State AZ ZIP 85745

Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact Laura Douglas, ADOT Community Relations Project Manager, at 602.712.7683 or ldouglas@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

有关中文信息, 请致电 1-844-544-8049.

CONTACT

MAIL: I-11 Tier 1 EIS Study Team • c/o ADOT Communications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S

i11study.com/Arizona

Please find below my comments opposing the Recommended Alternative on the Tier 1 Alternative on the Tier 1 Interstate 11 DEIS:

Please DO NOT adopt the Recommended Alternative, a new and expensive I-11 freeway through Avra/Altar Valley. It is a horrendous waste of taxpayers money that will fragment open space and have significant **unmitigatable** impacts on the adjacent environmentally sensitive areas, as well as nearby residents. It will cause degradation of the visitor/resident experience in nearby parks and the quality of life in The Greater Tucson Area.

As I am sure you are aware, The Tucson City Council voted (unanimously) to oppose the Avra Valley I-11 route.

I believe the most beneficial solution to provide for additional north/south traffic would be to expand the existing I-10 and I-19 corridors, rather than building an expensive new freeway. Consideration should be given to ways to lighten the traffic load on I-10 —by adding a light rail option, and providing other transportation options for people who would otherwise be driving cars on I-10.

If the Avra/Altar Valley I-11 is built, it will have far reaching impacts on the area's special Sonoran Desert habitants and it's wildlife, probably much more impact that is indicated in the report: there will be big effects on wildlife and wildlife habitat, tourism, property rights and private property owners and residents, Saguaro National Park, The Desert Museum, Ironwood National Monument, Tucson Mountain Park, Kitt Peak, Dark Skies, and Tribal Lands. The impact of this freeway would extend way beyond the actual freeway corridor, as the freeway presence will encourage real estate development and speculation as well as commercial development.

Residents of and visitors to the Tucson area have a right to expect a quiet and natural setting in this area—And would hardly be interested in experiencing freeway noise, commercial development, and light pollution.

An I-11 Freeway through Avra Valley would be a wide transportation corridor through protected public lands, causing fragmentation of these lands and severance of wildlife corridors. It would be very close to Saguaro N.P. and Ironwood N.M. The freeway would cross the existing Tucson Wildlife Mitigation Corridor that was created for the construction of CAP.

Certainly, not to be ignored is the proximity of the Proposed I-11 to Tucson's major water supply.

Thank you for your attention to my comments.

Flo Anderson

For 10 years I have been a part-time resident of Oro Valley



ECONOMIC AND ENVIRONMENTAL IMPACTS OF CLIMATE CHANGE IN ARIZONA

by **ROBERT REPETTO**, *PhD*

Arizona's citizens and its economy are among America's most vulnerable to the growing adverse impacts of climate change. Climate change will have significant impacts on water resources and economic opportunities. Recent polling shows that the majority of voters in Arizona believe that state and federal governments should do more to address these impacts.¹ To reduce the threats and realize the opportunities posed by climate change, Arizona's leaders must support regional, national and international programs to reduce greenhouse gas emissions and accelerate a transition to clean energy.

CLIMATE CHANGE'S IMPACT ON ARIZONA'S ENVIRONMENT

Climate change is already affecting Arizona's environment. Temperatures have risen by almost two degrees F in the past several decades, more rapidly than any other state in the lower 48 states, and are projected to continue increasing sharply by another three to five degrees F by 2050.² Rapid urbanization is exacerbating this trend by extending the urban heat island effect over larger areas and longer seasons, raising night-time temperatures by as much as 10 degrees compared to adjoining natural areas.³ Heat waves of extraordinarily high summertime temperatures for extended periods of time are becoming more common.⁴ The number of days with low night-time temperatures above 90 degrees has increased sharply in successive decades.⁵

Air and Water Quality Impact

Air and water quality will suffer. Low river flows and higher water temperatures will raise water pollution concentrations. Ozone and smog concentrations will rise with higher air temperatures and growing energy use. Smoke from fires and dust from dry arid landscapes will raise particulate concentrations.

Water Scarcity

Climate change is reducing precipitation, especially in the spring and early summer months, and these declines are projected to continue.⁶ Runoff in the Colorado and other river systems that Arizona's water supply depend on for direct use and for groundwater recharge will decline by 20-40 percent by mid-century, exacerbating water supply shortages that are already evident. The Colorado River system is already overstretched and unable to meet future demand.⁷ Reduced precipitation, increasing heat and evapotranspiration from soils and plants are making serious droughts a more frequent occurrence.⁸

In the past decade Arizona has been suffering from the worst drought in a century. Wildfires have increased in frequency and severity and will continue to do so as long as there are trees and other vegetation left to burn. Natural ecosystems, including Arizona's northern forests and its biodiversity hotspot (the Madrean Pine-Oak Woodlands) in the south, will be adversely affected by heat, drought, fire and proliferation of insect pests.

Adaptation to future water stresses in Arizona will be difficult and costly. Both groundwater and surface water resources are already over-allocated across much of the state. Increased population and economic growth will face water supplies that are already inadequate and diminishing with climate change, necessitating reallocations – largely out of agriculture – and different patterns of use. Yet, such changes are not determined by price and market signals. Water use in Arizona and throughout the Southwest is governed largely by administrative and judicial allocations involving private parties, local institutions, state, inter-state and federal authorities. Climate change will not only unsettle existing allocations, perhaps even the vital Colorado River Compact, but also introduce uncertainty into future allocation decisions, involving courts and government agencies in difficult conflicts.⁹

Urban water demand rises with increasing temperatures, as most water is used for outdoor watering. To meet the demand, water agencies will most likely be forced to consider costlier options as desalinization, waste water recycling and new diversions and storage projects to offset increasing shortages. Most of the supply enhancement projects under consideration, except conservation, are energy-intensive, but current energy supply options are themselves highly water-intensive, creating an escalating cost feedback loop.¹⁰ Inevitably, climate change will sharply raise the cost of meeting future water demand.

CLIMATE CHANGE'S ECONOMIC IMPACT

Climate change will have severe negative impacts on Arizona's economic drivers, as well as resulting in more costs for the state. A recent study by researchers at the Sandia National Laboratory considered impacts of precipitation declines on the half-dozen industries with the greatest water consumption (e.g., agriculture, utilities, mining, chemical manufacturing), sectors that make relatively small contributions to the state's GDP.¹¹ The study found that economic damages would be spread widely throughout the rest of the state's economy because of higher input costs, lower consumer incomes and spending, population changes and changes in the state's inter-regional competitiveness. Retail trade, food manufacturing and construction would be among the sectors most severely affected by these secondary effects but no sector would be unscathed. This study found Arizona to be among the nation's most vulnerable states, even though the full range of possible future heat, drought, and precipitation impacts was not considered, and optimistic assumptions about adaptation to future water shortages were included.

Impact on Agriculture and Ranching

For some of the most vulnerable sectors of Arizona's economy, the direct damages from climate change are already being felt. Agriculture and ranching are facing increasing heat, drought, water shortages and pest damages that combine to reduce yields and productivity. In bad years, feed shortages force many ranchers to sell off herds at distressed prices, taking heavy losses.¹² Arizona farmers are heavily dependent on irrigation and even those with senior water rights are likely to face increasing shortages. More marginalized farmers, including Latinos and Native Americans, are more vulnerable because their access to crop insurance, credit, federal disaster relief and other institutional support is weaker.¹³

Although farming and ranching constitute only about two percent of the state GDP,¹⁴ their importance to rural economies and associated industries is considerably larger, as is their political weight. Many Arizonan farmers and ranchers who hold senior water rights strongly resist water transfers to non-agricultural uses, even though urban and industrial water values are markedly higher than in most agricultural uses. There will be increasing pressure to transfer water out of agriculture toward industries that can afford to pay more for it¹⁵ but there are legal, political and institutional impediments to these reallocations. Adaptation to supply constraints is unlikely to be smooth or economically efficient.¹⁶

Potential Loss of High Tech Manufacturing Industry

Arizona's most dynamic and growth-generating sectors are also surprisingly vulnerable to climate change. Arizona was once a leader in high-tech manufacturing, which generated significant sales outside the state and many high-paying jobs within it. In 2005, the high-tech sector contributed five percent of state GDP,

four percent of employment and seven percent of earnings. If indirect effects are included, high-tech's contribution rises to 11, 10 and 13 percent, respectively. Yet, Arizona's lead in these industries has been eroding to the extent that Arizona is now not significantly above the average of all the states.¹⁷ Most high-tech industries are "footloose": their location is not tied to local markets or to raw material supplies. High-tech firms must be able to attract and retain highly trained and educated executives, engineers and scientists, who typically have nation-wide choices of employment. For this reason, "quality of life" considerations enter strongly into locational decisions.¹⁸

Salient among these considerations are an attractive climate and scenery, outdoor recreation

Though there has been a significant movement of economic activity toward the Sunbelt states in recent decades, growth of population and employment *within* the Sunbelt has been negatively associated with temperature, favoring metropolitan statistical areas with more moderate climates.

resources, and cultural and educational opportunities. Prolonged summer heat in excess of 100 degrees and rising at times to 110 and 120 degrees is a deterrent rather than an attraction. For example, there is a marked hot-season drop-off of business travel to Arizona, measured by business segment hotel rooms sold during the summer months.¹⁹ Climate change is likely to discourage movement into the state by footloose high-tech industries, research centers and corporate headquarters that are sensitive to quality of life issues. Though there has been a significant movement of economic activity toward the Sunbelt states in recent decades, growth of population and employment *within* the Sunbelt has been negatively associated with temperature, favoring metropolitan statistical areas with more moderate climates.²⁰

Damage to Tourism Industry

A substantial segment of Arizona's economy is the extremely climate-sensitive travel and tourism industry. Almost 37 million visitors in 2010 spent nearly \$18 billion on a wide variety of goods and services, generating more than 150,000 jobs, nearly \$5 billion in direct earnings, and \$3.5 billion in state and local taxes.²¹ Eighty percent of this business is derived from out-of-state visitors, making tourism Arizona's leading export industry. Tourism also generated \$297 million in construction investment, more than 10 percent of all non-residential construction in Arizona in 2010. This investment supported 5,300 construction jobs with earnings of \$280 million in a weak economy. Including the earnings and employment of businesses supplying the tourism sector and the spending by employees in those businesses, the direct plus indirect contribution of tourism to the Arizona economy rises considerably, to 283,000 jobs with \$9.7 billion in annual earnings.²²

Recent experience confirms that visitation is highly sensitive to climate and its effects. Controlling for other influences, drought reduces visits to some national parks by seven percent.²³ During the 1999-2003 period, when lake levels fell 2.1 percent at Mead and 5.4 percent at Powell, those changes reduced visits to Glen Canyon by half a million visitors and reduced spending by \$32 million. At Lake Powell, there were almost a million fewer visitors and \$28 million less in tourist spending. Tourism statistics show that for every one percent drop in the reservoir level, visits to Lake Powell fall by five percent.²⁴ Reduced river flows and deterioration of riparian habitats undermines fishing, rafting, boating and other water-based activities. Forest fires are also a deterrent.²⁵

Tourism statistics show that for every one percent drop in the reservoir level, visits to Lake Powell fall by five percent.

According to the U.S. Forest Service, there are 182 communities bordering federal lands in Arizona and New Mexico that are at risk of forest fires.²⁶ Many of these towns host second home developments, which make up more than six percent of all residences in Arizona.²⁷ Arizona's ski facilities are also vulnerable. Rising winter temperatures, less precipitation falling as snow, and increasing water scarcity will shorten the ski season, perhaps drastically, especially at the Arizona SnowBowl where snowmaking possibilities are limited. The lack of snow will hurt not only the ski operations but also the value of second homes and other real estate developments around the ski areas.

Skiing, fishing and other outdoor recreational activities will suffer from climate change. Forty percent of Arizonans surveyed engage in sport and fitness exercises and 25 percent enjoy outdoor recreation.²⁸ More than two-thirds of the golfers on the state's 421 courses are residents, many of them retirees who have relocated to Arizona. Golfing makes an important economic contribution, estimated in 2004 at \$3.4 billion, counting direct, indirect and induced golf-related spending. The higher prices commanded by houses in golfing developments amount to a premium of over \$2 billion.²⁹ However, water scarcity has already forced golf courses to reduce consumptive water use significantly, in part by restricting the area of turf. Climate change will make further restrictions inevitable. The lack of assured sustainable water supplies may even constrain future residential real estate and golf course resort developments. A more threatening effect is that golfing becomes a less appealing sport when temperatures rise to uncomfortably hot levels. Fewer rounds of golf are played and green fees fall in the hot spring and summer months. As the duration and intensity of the hot season increases, golf clubs revenues will suffer. The demand for membership will fall, hurting finances and making it difficult for older members to sell without taking losses.

Less Desirable Retirement Destination

The broader impact of climate change will be a decline in Arizona's attractiveness as a retirement destination, which has always been based largely on its warm and dry climate. Retirees moving to Arizona make important economic contributions. In 2000, more than 20 percent of the population had been living in another state five years earlier. More than half the population was born in another state. Since retirees' incomes are not based on employment earnings, they bring a stable source of spending from outside the states. In 2000, 27 percent of the population was receiving social security benefits.³⁰ In Maricopa and Pima counties, subject to the widening heat island over urban and suburban population centers, life throughout much of the year will become increasingly uncomfortable and even unhealthy for seniors venturing outdoors.

Electricity Costs

Electricity generating costs will also increase for several reasons. Low-cost hydroelectric production will fall with the reduced runoff from the Colorado River. Cooling water required for coal, gas, nuclear, and solar thermal generating plants will become scarcer and more costly. Non-conventional oil and gas production is extremely water-intensive and will face limits on availability. Because hotter weather boosts the photochemical reactions that create atmospheric smog and because urban areas are already out of compliance with existing national ozone standards, which may be tightened substantially, coal-fired power plants will have to install expensive controls on nitrogen oxide emissions, an ozone precursor in order to keep operating.

Climate change will also raise the summer peak in electricity demand and extend it through a longer air conditioning season, when it accounts for 70 percent of household electricity consumption. Meeting summer peak demand is nearly twice as costly as meeting off-peak requirements and considerably more costly than meeting the lower cool season peak demand. Under heat and drought conditions, peak summer generating costs can rise to 30-50 cents per kwh. Ironically, the main objection to policies limiting greenhouse gas emissions is that they will raise energy costs but in Arizona energy costs will also increase if such policies are not enacted and climate change goes unchecked.

Rising Health Care Costs

Climate change will place additional stresses on Arizona's health care system, which is already constrained by rising costs.³¹ Nearly one in five Arizonans are dependent on Arizona's Medicaid equivalent (AHCCCS) and an additional 19 percent have no health insurance at all.³² Asthma attacks and allergies will be exacerbated by higher air pollution levels, including ozone, particulates from dust and wildfires, and higher pollen counts that start earlier in the spring. Higher ozone and particulate levels are reliably linked to increased mortality and morbidity. Among the elderly, stroke and heart attack increase with rising heat.³³ People with chronic heart or lung diseases are twice as likely to suffer heat stroke during a heat wave. Heart disease accounted for 24 percent of deaths in Arizona in 2005, while stroke caused five percent of deaths.³⁴

In the past decade, a six percent increase in heat-related mortality was observed for each one degree F rise in the heat index and mortality also rose with the duration of the heat wave.³⁵ Between 1999 and 2009, the percentage of annual deaths occurring during the hot April to September months rose from 45 to 49 percent and heat-related dispatches of medical emergency teams climb sharply in the summer months, averaging more than nine a day in Phoenix alone.³⁶ Low-income households are much more vulnerable to these health effects because the high cost of electricity prevents them from using air conditioning more consistently.³⁷ Unless climate change is brought under control, Arizona's health costs will continue to rise rapidly and the state's citizens will suffer.

THE WAY FORWARD

Given the impact that climate change will have on Arizona's economy and citizens, the state's leaders should support regional, national and international efforts to reduce greenhouse gas emissions along with measures specific to Arizona itself. Arizona is positioned to benefit substantially from a transition to clean renewable energy. Its solar potential is the finest in the country. Arizona could become a world leader in solar technology, generating tens of thousands of high-paying jobs and billions of dollars in export earnings beyond the state's borders. The National Renewable Energy Lab has estimated that Arizona has the potential for 2.5 gigawatts of concentrating solar electricity, able to generate 5.8 gigawatt hours of electricity, more than in any other state in the nation.³⁸ Little of this potential has yet been realized.

There are already national, state and utility level incentives in place to make use of this enormous potential, including Arizona's Renewable Portfolio Standard, which mandates a 15 percent share of renewable generation by 2025.³⁹ A recent study has produced a roadmap by which the state can stimulate solar investment and accelerate the pace of installation and simultaneously develop the supporting manufacturing and research capabilities.⁴⁰ A key stimulus to rapid development would be a regional or national policy that sets a price on carbon dioxide emissions through either an emission fee or a cap-and-trade regime applied to the electric utility sector. Such a policy would equalize the cost structure so that solar power could compete economically in intra-state and regional markets. With the cost disadvantage neutralized, solar's other advantages of stable operating costs and low pollution would lead to rapid deployment. It is in Arizona's economic interest to support national and regional policies of this kind.

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ABOUT DĚMOS

Dēmos is a non-partisan public policy research and advocacy organization founded in 2000. Headquartered in New York City, Dēmos works with policymakers around the country in pursuit of four overarching goals—a more equitable economy with widely shared prosperity and opportunity; a vibrant and inclusive democracy with high levels of voting and civic engagement; an empowered public sector that works for the common good; and responsible U.S. engagement in an interdependent world.

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Comments on the I-11 Draft Tier 1 EIS & Preliminary section 4(f) Evaluation (Draft Tier 1 EIS)

I am writing **in opposition** to the recommended alternative route in the Tier 1 DEIS for Interstate 11.

False Premise for Purpose and Need of Project

The basic purpose of this project is already fulfilled with the existence of the I-19 & I-10 corridor. This has promoted regional mobility for products and people for decades, connecting Nogales to Tucson and beyond. The solution to increased use of the interstate highway corridors is to widen the highways with additional lanes which has been going on nationally for many years as use increases. One would also expect the City of Tucson to be steadily improving its mass transit system, including the streetcar routes, to that fewer citizens may need to access I-10 in the future.

It is counterproductive to increase capacity on the Interstate system by building a parallel unit such as the proposed I-11 project rather than augmenting the capacity of the current system. Congestion levels on I-19 and I-10 are likely to be reduced by such projects as the proposed truck entry point in Douglas for traffic heading east on I-10 and the further development and use of the Port of Guaymas. In addition, the uncertainty in the balance of trade between Mexico and the United States due to changes in NAFTA and US overall trade policy seems likely to impact the future of truck traffic on the I-19 corridor.

The mention of homeland and national defense as a rationale for this project is totally inappropriate and indefensible. This seems to be simply grasping at straws and many of us living in this region strongly resist any attempt to further develop a militarized zone in southern Arizona.

Environmental Impacts of the Proposed Altar and Avra Valley I-11 Route

Wildlife Corridor & Population Disruption

With the existence of the Sky Islands arrangement of mountains in this region, the proposed highway would further impact the movement of animals between these regions which is essential for the long-term genetic health of the populations. The Tucson Wildlife Mitigation Corridor negotiated as part of the CAP water canal is a good example of the need for maintaining wildlife movement. Further fragmentation of habitats which would occur all along the proposed route have an impact on wildlife populations such as desert bighorn sheep.

Public Land Encroachment and Aesthetics

It can easily be argued that our Public Lands are our greatest National Treasure and have made for our democracy being so unique and strong. These lands belong to all citizens and are highly valued by the global community as well. Often local and state governments and private landowners around the country have agreed to create buffer zones bordering our public lands to add further protection which we have leaven to be necessary and important as the years go by. For example, air and water shed bordering or contiguous with the lands may have a negative impact if pollution and development are not managed well. The proposed route corridor comes within a quarter mile of the Saguaro National Park West boundary and at several points even closer to the edge of Ironwood Forest National Monument.

The close by Pima Mountain Park and open space also would have similar threats to its biological and aesthetic integrity impacted by the construction of I-11. My first view of the valley from Gates Pass in 1972 is something I'll never forget and helped solidify my appreciation for public lands and the "wide open spaces" we all seek to experience and protect. In this dry and higher elevation area the noise pollution created by high speed vehicles on a highway such as I-11 would forever alter the life experiences in the valley.

The Tohono O’Oodham Nation

In a similar fashion to the public lands of the United State and Pima County, the lands of the Pascua Yaqui Tribe and the Tohono O’Oodham Nation would be negatively impacted by the noise, air and water pollutions issues of the I-11 project. These lands are also part of the wildlife corridors connecting our already fragmented habitats and need protection from disruptive projects such as this.

The world class Kitt Peak Observatory is on Tohono O’Oodham land and the potential negative impact of light pollution from increased development associated with the I-11 corridor would impar scientific work on the Peak.

Economic Impacts to the Regions from this I-11 Plan

The National Interstate Highway System was started during the Cold War in the Eisenhower administration with the rationale of being needed for national security. It was argued that it would be needed for evacuation of cities in case of a nuclear war and also to move some of our military apparatus around so that it would be more difficult to target. We now know that it also had a tremendous economic impact on our nations, perhaps precipitating the biggest stimulus for growth in our history. People traveled more, trucks replaced trains to a great extent, and fast food consumption and interchange economies developed as a result of these highways. However, many communities also became virtual ghost towns such as those bypassed by I-40 along the old Route 66 in northern Arizona. The bottom line is that interstate highways can have a dramatic impact on local economies and in the case of I-11 I believe it will be a negative impact on our region.

An analysis of the DIS estimated cost of the Recommended Alternate Routs through the Avra and Altar Valleys would cost billions more than sticking to improvements in the already established I-19/I-10 corridor. This is significant and even taken alone is cause for great concern about this option. The City of Tucson has voiced some opposition to this route and would incur some economic loss by having traffic bypass the city. The route also would encourage development and further sprawl of growth in the valleys that would detract from already established rural and tourism economy.

Negative Impacts to Private Property Owners

I have a friend that lives on the border of the Recommended Alternate Route, actually between the route and the border of Saguaro National Park West. His family has lived there for 44 years and treasure and care for their property beyond measure. His family and thousands of other property owners along the route would either loose some of all of their land or be forced to face a life changing impact on their lives. In the early 1960’s I had some relatives who had to give up their farms in Ohio via eminent domain for the construction of I-71. While they were compensated for their land, there was an emptiness in their lives that was never again filled. We have to be really careful about embarking on public projects that impact so many people so unnecessarily, most particularly on weakly fabricated statements of “Purpose and Need”!

Summary

For all the above reasons and for the future quality of live in southern Arizona I **very strongly oppose** the future development of the I-11 concept and particularly the Recommended Corridor Alternative.



Talking Points for Public Meetings and Written Comments on the Tier 1 Interstate 11 DEIS

Opposition to the Recommended Alternative

BACKGROUND

We oppose the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11. This route is located west of Tucson and bypasses Tucson through rural Altar and Avra Valleys, a landscape bordered by treasured and protected public lands and iconic tourist attractions that will be irreparably harmed by a nearby freeway.

KEY TALKING POINTS

- The Recommended Alternative route would damage both natural resources and degrade the visitor experience at a wide array of public lands, especially those located in the Tucson Mountains. No mitigation could offset these negative impacts.
- Building a freeway through Bureau of Reclamation mitigation lands would violate the purpose for which these lands were set aside. It is impossible to adequately mitigate for the impacts from a federal freeway to lands that already mitigate for another federal project, the Central Arizona Project canal.
- The Recommended Alternative route would sever critical wildlife corridors. This fragmentation would destroy the ability of wildlife species such as desert bighorn sheep to disperse, roam, find new mates, and expand their home ranges.
- The Recommended Alternative route would cost \$3.4 billion more to build than co-locating I-11 with I-19 and I-10 through Tucson.
- Downtown Tucson and economic powerhouses such as the Arizona-Sonora Desert Museum and Saguaro National Park would see reduced revenue and negative economic impacts.
- The Recommended Alternative route would cause significant noise, air, and light pollution, encourage urban sprawl, and destroy the rural character of the Altar and Avra Valleys.
- Lands and wildlife habitat that would be severely impacted by the Recommended Alternative route include mitigation lands for Pima County's Section 10 Habitat Conservation Plan, a part of the nationally-recognized Sonoran Desert Conservation Plan.
- The City of Tucson has voiced opposition to this route as it places a freeway adjacent to the City's major water supply. We cannot guard against a toxic spill that would threaten Tucson's most vital resource.

EXPANDED TALKING POINTS

IMPACTS TO PUBLIC LANDS

The Recommended Alternative route is located perilously close to a wide array of public lands, including:

- Federal lands: Saguaro National Park West, Ironwood Forest National Monument, and the Tucson Mitigation Corridor (owned by the Bureau of Reclamation and managed by Pima County). In the case of Saguaro National Park West, the route comes within *1,300 feet* of the park boundary. In the case of Ironwood Forest National Monument, the route comes within *400 feet* of the monument boundaries in multiple locations.

- County lands: Tucson Mountain Park and open space properties purchased and protected under Pima County's Sonoran Desert Conservation Plan and Section 10 Habitat Conservation Plan.
- Tribal lands owned by the Pascua Yaqui Tribe and the Tohono O'odham Nation.

IMPACTS TO WILDLIFE CORRIDORS

The Recommended Alternative route:

- Severs important wildlife corridors between the Tucson Mountains and Ironwood Forest National Monument and the Waterman Mountains.
- Directly crosses through the Tucson Wildlife Mitigation Corridor that *was created as mitigation* for impacts to wildlife corridors by the construction of the Central Arizona Project canal.
- In 2016, two desert bighorn sheep rams were photographed in numerous locations in the Tucson Mountains. It is highly likely that these rams used existing wildlife corridors between Ironwood Forest National Monument (where a herd of desert bighorn sheep exists) and the Tucson Mountains to travel to the southern section of the Tucson Mountains. These wildlife corridors would be fractured and fragmented forever by a new freeway.

IMPACTS TO NOISE, AIR, AND LIGHT POLLUTION

The Recommended Alternative route would:

- Cause significant noise, air, and light pollution, negatively impacting a wide variety of public and private lands, including a protected wilderness area in Saguaro National Park.
- Exponentially encourage urban sprawl west of the Tucson Mountains, destroying the rural character of this area.
- Negatively impact scientific research at Kitt Peak Observatory by increasing night lighting and compromising the ability of scientists to conduct their research.

IMPACTS TO THE ECONOMY

The Recommended Alternative route *from the border to Casa Grande* would:

- Cost **\$3.4 billion more** than co-locating I-11 with I-19 and I-10 through the Tucson region (according to page 2-33 in Chapter 2 of the DEIS, routes A/B/G of the Orange Route Alternative would cost ~\$586 million compared to routes A/D/F of the Green Route Alternative which would cost ~\$3.9 BILLION.).
- Cause economic loss to Tucson by diverting traffic away from Tucson's downtown and growing business districts.
- Lead to negative economic impacts to tourism powerhouses such as the Arizona-Sonoran Desert Museum and Saguaro National Park West, among many others.
- Lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other services.

IMPACTS TO PRIVATE PROPERTY

The Recommended Alternative route would:

- Encroach on the private property rights of thousands of private property owners along its entire north-south length, lowering property values and destroying the rural character of lands in Avra Valley, Picture Rocks, and other areas in Pima County, along with areas to the north.

FOR MORE INFORMATION, visit our action webpage at:
<https://www.sonorandesert.org/learning-more/interstate-11/>



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

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It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

My Vote is No

Trains need to be utilized.

Contact Information (optional)

Name _____ Email _____

Address _____

City _____ State _____ ZIP _____

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有关中文信息, 请致电 1-844-544-8049.

CONTACT

MAIL: I-11 Tier 1 EIS Study Team • c/o ADOT Communications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S

i11study.com/Arizona



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This I-11 corridor has been met with a huge opposition, yet, even ~~des~~ after so much public outcry, the huge expense, the flawed statistics that reason a 20 MINUTE delay in through traffic to Nogales ^{by 2040} which is a HORRIBLE reason to construct this corridor, ADOT has still chosen its proffered alternative through the avra valley. I am along with 95% of the public extremely AGAINST this new I-11 corridor through the avra valley.

I support a NO BUILD option or a double decking I-10. Any other route is completely ridiculous!

Contact Information (optional)

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Address _____

City _____ State _____ ZIP _____

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Nogales to Wickenburg

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1. I'll will be needed as population keeps increasing in this area. I'm glad someone is planning this roadway today.

Contact Information (optional)

Name _____ Email _____

Address _____

City _____ State _____ ZIP _____

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- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

please make sure to maximize
WILDLIFE crossings.
please!

Contact Information (optional)

Name _____ Email _____

Address _____

City Wickenburg State _____ ZIP _____

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6-12-19

To Whom it May Concern

In response to your
flyer I received in the
mail.

I am very much against
the I-11 project

The thought of our
beautiful desert being torn
up and ~~the~~ people losing
their homes is very
disturbing.

This destruction is
unnecessary. Not to speak of the Cost.

Thank You,
registered Voter

P.S. I am not a property owner.
But this is still wrong.

Democrats for Picture Rocks
Picture Rocks AZ
520-572-1881
www.democratsforpicturerocks.org

February 12, 2019

Let it be known that the members of Democrats for Picture Rocks absolutely and unequivocally oppose any high-speed roadway being built anywhere in Picture Rocks, Avra Valley or any area west of the Tucson Mountains.

We stand with our elected officials, Representative to Congress Raul Grijalva, and Supervisor for District Three Sharon Bronson, who have recorded their opposition publicly.

We are proud of our desert homes and protective of any incursion into the delicate eco-system that surrounds us. We reject any argument that supports a road that will cover land in Saguaro National Park, the Tohono O'odham reservation, the Arizona Desert Museum, the Pima County Mountain Park or our neighborhoods. In fact, we have yet to hear any good argument for any road, especially one that will by-pass the city of Tucson.

We know we do not stand alone. For the past two years the Arizona Department of Transportation has had meetings and published preliminary findings. At every meeting there were representatives from allied groups who strongly opposed any freeway in the desert. Concerned citizens are working together to stop any route that will damage Tucson.

We, the members and representatives of Democrats for Picture Rocks, want to publicly register our opposition.



PROYECTO DE DECLARACIÓN DE IMPACTO AMBIENTAL DE NIVEL 1 DE LA INTERESTATAL I-11 Y EVALUACIÓN PRELIMINAR DE LA SECCIÓN 4(f) (PROYECTO DE EIS DE NIVEL 1), de Nogales a Wickenburg

FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de comentarios públicos sobre el proyecto de declaración de impacto ambiental de nivel 1 de la I-11.

El Departamento de Transporte de Arizona (ADOT) y la Administración de Autopistas Federales (FHWA) invitan a todas las partes interesadas a enviar sus comentarios sobre cualquier aspecto del proyecto de EIS de nivel 1. ADOT y FHWA tendrán en cuenta todos los comentarios al preparar la versión final de EIS de nivel 1, que incluirá las respuestas a todos los comentarios recibidos durante el periodo de comentarios sobre el proyecto de EIS de nivel 1 e identificarán una alternativa preferida (una alternativa a favor de la construcción o la alternativa en contra de la construcción).

Al enviar sus comentarios, sea lo más específico posible y proporcione detalles sobre sus inquietudes y recomendaciones.

A ADOT y FHWA les resulta útil recibir comentarios sobre:

- cualquier alternativa o medida de mitigación que usted apoye o no apoye, y por qué;
- el análisis del impacto ambiental y el rendimiento de las alternativas;
- la información que cree que está incompleta o es incorrecta

Escriba sus comentarios en letra de imprenta a continuación. Los comentarios se deben recibir o sellar antes del 8 de julio de 2019.

I oppose 100% bringing I-11 so close to Vista Royale & Mathis Ranch. There are no businesses once you leave Hwy 60 and connect to Hwy 93. This makes NO sense! The original plan of 4-5 miles away from Vista Royale was not an issue. Our economy thrives because of our location & beauty & lots of state land. People move to our town for peace & quiet. Homes that are built close to or abutting state land has added value. Homes at Vista Royale are priced at \$500K and up because of the location. Most people would not purchase a home located right next to a freeway. Maybe in the city but NOT in Wickenburg. The Town of Wickenburg recently have rejected their original agreement with ADOT. Hwy 60 & Hwy 71 would be perfect for I-11 and save us taxpayers 1000's of Dollars. I believe I-11 would also be an easy use for Drug Traffickers. PLEASE DO NOT Ruin our wonderful town!

Información de contacto (opcional)

Nombre

June Antos + Chuck Antos (Didn't have this in English)

Dirección

PO Box 1163

Ciudad

Wickenburg

Estado

AZ

Código Postal

85358

De acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés) y otras normas y leyes antidiscriminatorias, el Departamento de Transporte de Arizona (ADOT) no discrimina por motivos de raza, color, origen nacional, sexo, edad o discapacidad. Las personas que requieran asistencia (dentro de lo razonable), ya sea por el idioma o por discapacidad, deben comunicarse con Laura Douglas al teléfono 602.712.7683 o a ldouglas@azdot.gov. Las solicitudes deben presentarse lo antes posible para permitir que el Estado tenga la oportunidad de disponer las medidas necesarias.

如需中文文件請致電 1-844-544-8049

CONTACTO

CORREO POSTAL: Equipo del estudio de la EIS de nivel 1 de la I-11 • a/c Comunicaciones de ADOT • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007
CORREO ELECTRÓNICO: i-11ADOTStudy@hdrinc.com | **TELÉFONO:** 1-844-544-8049 (línea gratuita/bilingüe) | **SITIO WEB:** i11study.com/Arizona



N.º de proyecto de ADOT 999 SW 0M5180 01P | Subvención federal n.º 999-M(161)S

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I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

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- Information you believe is incomplete or incorrect

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I owned a home on Chestnut St. in Wickenburg - when you (ADOT) put the round about & Bypass in you needed my property and I had to sell to you, so my Husband & I purchased Property in Vista Royale (far away from Highway) we Build a home and in 2010 my husband Broke his neck and we had to sell due to medical. my husband has since passed away so I purchase Property 1 month ago to Build a new home and I find out that you are planning to Bring the Road very close or through Vista Royale - The original Plan was to be 5 miles or more from the west side of Vista Royale - It is a complete lack of common sense on your part to even think about Building a beautiful neighbor hood. Please take into consideration the peoples wishes that have build and enjoy our home there

Contact Information (optional)

Name Dixie Custer Email DIXIEJim65@gmail.com
 Address Mailing address - P.O. Box 26 Wickenburg - Property address - in Vista Royale is
 City 21675 W. Date Creek R. - Vista Royal State AZ ZIP 85358

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 EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/billing) | WEBSITE: i11study.com/Arizona



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- Information you believe is incomplete or incorrect

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This comment is on corridor alternatives generally affecting two parts of the Wickenburg area.

1 In the area of the Vulture Mountains Recreation Area the corridor should be moved to the west as far as possible. Moving the corridor to the west will reduce intrusion on the Recreation Area, and that the area has been protected in this way will be more and more appreciated as the area develops.

The corridor should not necessarily include a power line component. While electric power companies may disagree, the view from here is that it is not in the best interests of public health to have people traveling on interstate routes automatically subject to power line electromagnetic radiation hour after hour after hour.

2 The proposed corridor should cross US 60 as far to the west as possible. This will make the corridor less intrusive to the Town of Wickenburg as it now exists, and again, that the area has been protected in this way will be more and more appreciated as the area develops over time.

E. Curtis Arnett
PO Box 1073
Wickenburg, AZ 85358

Contact Information (optional)

Name E. CURTIS ARNETT Email curtisarnett@cox.net
Address [REDACTED]
City [REDACTED] State [REDACTED] ZIP [REDACTED]

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ADOT

Arizona Department of Transportation
Federal Highway Administration

ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S

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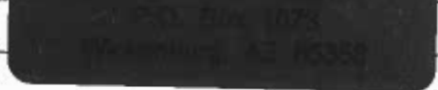
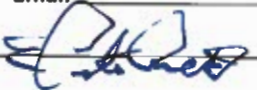
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E. Curtis Arnett
PO Box 1073
Wickenburg, AZ 85358

Contact Information (optional)

Name  Email curtisarnett@cox.net
Address   06/24/2019
City _____ State _____ ZIP _____

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EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingual) | WEBSITE: i11study.com/Arizona

Mr. & Mrs. Art Arnold
26551 W. Hazen Rd.
Buckeye, AZ 85326
623 386 2188
JA4297@msn.com
5/13/19

Office of the Chief Counsel
Federal Highway Administration – Western Division
US Department of Transportation
12300 W. Dakota Ave.
Lakewood, Colorado 80228
United States

Dear Sir or Madam:

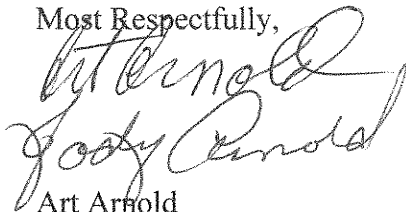
We are the second generation living on our family's farm/ranch. We are writing to express my concern about the recommended corridor for Interstate 11. I understand the purpose is to connect major metropolitan areas and markets with Mexico and Canada. The recommended corridor will destroy numerous homes, businesses and farms, particularly along Beloit and Hazen Roads. The entire Palo Verde community will also be destroyed. Like ours, many of the homes and farms in the Buckeye/Palo Verde community have been owned and operated by the same families for generations. These places are not only our lively hoods but a lifestyle to pass on to future generations. We do not see the need for an additional interstate. Travel to and from Mexico and Canada already flourishes by using established Interstates 8, 10, and 19 along with State Routes 189, 85, and 93. Which begs the question: Why not improve existing roads?

Improving existing roads is the only choice.

- Economically,
- Environmentally
- Minimal impact to residents and farmers

We are looking forward to your response.

Most Respectfully,

The block contains two handwritten signatures in black ink. The first signature is 'Art Arnold' and the second is 'Jody Arnold'. They are written in a cursive, flowing style.

Art Arnold
Jody Arnold



**SIERRA
CLUB**

Grand Canyon Chapter • 514 W. Roosevelt St. • Phoenix, AZ 85003
Phone: (602) 253-8633 • Email: grand.canyon.chapter@sierraclub.org

July 8, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., Mail Drop 126F
Phoenix, AZ 85007
Sent via email: I-11ADOTStudy@hdrinc.com

Re: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

Dear Interstate 11 EIS Study Team:

Thank you for the opportunity to comment on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. Please accept these comments on behalf of Sierra Club's Grand Canyon (Arizona) Chapter and our more than 60,000 members and supporters in Arizona.

Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Sierra Club has long been committed to protecting public lands and public health and to ensuring that transportation and development accommodate ecological considerations. Our members have a significant interest in the proposed I-11 as many live in or use areas within and near these corridors and will be affected by the additional air pollution, destruction of wildlife habitat, significant noise, and other negative impacts of the proposed freeway and associated corridor.

Sierra Club opposes the proposed I-11 Freeway Corridor and the three "build" alternatives outlined in the Draft Environmental Impact Statement (DEIS) and remains concerned about the significant negative impacts of this proposed corridor, and strongly urges selection of a "no build" alternative. Note that a "no build" alternative need not be a "do nothing" alternative. The Arizona Department of Transportation (ADOT) could instead seriously consider and invest dollars in passenger rail transportation along the I-10 corridor and, as noted in the DEIS "Arizona freight rail corridors will have adequate rail capacity for the foreseeable future." (DEIS at 2-11) In addition to these comments, Sierra Club supports and incorporates by reference the comments made by the Coalition for Sonoran Desert Protection et al. Sierra Club Grand Canyon Chapter is a co-signer on those comments.

Background

Our country annually invests more than \$200 billion of our taxes in transportation infrastructure, including freeways, bridges, airports, public transportation, and sidewalks associated with roads. In 2014, \$279 billion was spent on transportation infrastructure, 60 percent of which was allocated to



highways.¹ These projects have by-and-large continued to promote our nation's reliance on oil and gas and to exacerbate public health and safety issues and both directly and indirectly contribute to our climate crisis as most of our nation's and Arizona's greenhouse gas emissions come from vehicles².

The National Environmental Policy Act (NEPA) and the regulations promulgated to implement the act (42 U.S.C. § 4321, *et seq.*, 40 CFR § 1500.1, *et seq.*) mandate that the lead agency, the Federal Highway Administration (FHWA), assesses and evaluates the environmental impacts of the I-11 Corridor and that reasonable alternatives be considered (42 U.S.C. § 4332 102 C). NEPA requires the lead agency to "[r]igorously explore and objectively evaluate all reasonable alternatives," including those that are "not within the jurisdiction of the lead agency" (40 CFR 1502.14(a) and (c)). The Study Area for the proposed I-11 was arbitrarily limited, as was the range of options, including the no-build option. FHWA must seriously consider addressing transportation issues via improving infrastructure outside the Study Area and how improved mass transit both in and outside the Study Area could improve transportation and reduce the need to construct new roadways. Further, it admits that rail freight capacity is adequate for the near future.

FHWA, as the lead agency for this project, must consider cumulative impacts as well as direct and indirect impacts of the proposed corridor. The potential impacts of this project are large and significant and are underestimated in the DEIS. As mandated by NEPA, the DEIS should have included all reasonable alternatives, an evaluation of those alternatives, and mitigation measures to minimize the disturbance and impact of the project. This DEIS does not include a transit/rail option and has missed many key impacts. As far as mitigation goes, it is clear that many of the impacts from this proposal simply cannot be mitigated.

The Recommended Alternative route identified in the DEIS would be destructive and have devastating and unmitigable impacts to public lands, wildlife, air quality, and human health.

Purpose and Need

We have expressed this previously but ask again that FHWA and the Arizona Department of Transportation (ADOT) evaluate and demonstrate the need for this corridor and why it is being proposed for these locations. Economics and congestion were the main factors considered in order to justify moving forward with this project. Although these are both important elements, many other issues should also be taken into account when justifying whether or not a project is needed and should proceed. Examples of other factors to consider include public needs and desires, environmental impacts, public health concerns, land use, and more. By only focusing on economics and congestion, the "justification" for this corridor is biased from the beginning and clearly swayed toward the need for it. If even one or a combination of the other factors were used without considering economics or congestion, the justification outcome would be quite different. In order to provide a complete picture and to truly understand whether or not this corridor is justified, all factors must be included in the analysis.

Furthermore, we question that this proposed freeway would even address the congestion issues – each time another freeway is built, we have another crowded freeway, due, at least in part, to induced demand, which FHWA and ADOT fail to consider and evaluate in the DEIS. That is a

¹ Congressional Budget Office. 2015. Public spending on transportation and water infrastructure, 1956 to 2014. Available online at <https://www.cbo.gov/sites/default/files/114th-congress-2015-2016/reports/49910-Infrastructure.pdf>.

² <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>

serious omission in evaluating the purpose and need, developing the alternatives, and evaluating the impacts of those alternatives.

Negative Impacts of Freeways

The construction of freeways can introduce or amplify various negative impacts to local economies, ecology, and public health, especially for vulnerable populations. Freeways create a bypass system, whereby travelers or even locals can reach their destinations without exposure to local markets and services. Although tax dollars contribute immensely to the building and long-term maintenance of freeways, this infrastructure presence does not pay back these funds and even potentially decreases cities' revenues as well the property values of taxpayers living near the freeway.³ Such effects should have been evaluated in the DEIS.

Focusing on interstates and freeways without providing adequate alternate transportation modes continues America's forced addiction to vehicles, in which people must have access to an automobile in order to commute or travel. This disproportionately affects low-income residents and is a huge burden to taxpayers. In addition, these roads frequently cut through low-income and predominantly minority neighbors, resulting in fragmentation of neighborhoods and displacement of people who do not have good housing alternatives.⁴

Local ecology suffers enormously. In fact, roads are a chief threat to both local and global biodiversity.^{5,6} Regarding wildlife, the leading cause of death for many animals and for reductions in local wildlife populations can be attributed to road mortality. More than one million vertebrates die on roads every day in the United States,⁷ but this number may be a significant underestimate of true mortality rates⁸ and also does not account for impacts on invertebrate species. Effects extend far beyond just direct mortality and the immediate roadway, however.⁹ The presence of a freeway fragments and alters species' habitats, which is the leading cause of species' declines and sensitivity.^{10,11} Chemical, light, and noise pollution associated with freeways act as a detriment to various species' breeding and migration patterns and can negatively affect normal behaviors.^{12,13} Lands cleared for roads can also foster invasive species, which substantially alter ecosystem composition and processes.¹⁴ In short, the

³ Mayors Innovation Project 2013

⁴ Dreier, P., J.H. Molenkopf, and T. Swanstrom. 2004. Place matters: metropolitics for the twenty-first century. University Press of Kansas.

⁵ Jackson, N.D., and L. Fahrig. 2011. Relative effects of road mortality and decreased connectivity on population genetic diversity. *Biological Conservation* 144:3143–3148.

⁶ Laurence, W.F., and A. Balmford. 2013. Land use: a global map for road building. *Nature* 495:308–309.

⁷ Environmental Science. 2016. The environmental impact of roads. Available online at <http://www.environmentalscience.org/roads>.

⁸ Zimmerman Teixeira, F., A.V. Pfeifer Coelho, I. Beraldi Esperandio, and A. Kindel. 2013. Vertebrate road mortality estimates: effects of sampling methods and carcass removal. *Biological Conservation* 157:317–323.

⁹ Holderegger, R., and M. Di Giulio. 2010. The genetic effects of roads: a review of empirical evidence. *Basic and Applied Ecology* 11(6):522–531.

¹⁰ Environmental Science 2016

¹¹ Jackson and Fahrig 2011.

¹² Environmental Science 2016

¹³ Summers, P.D., G.M. Cunningham, and L. Fahrig. 2011. Are the negative effects of roads on breeding birds caused by traffic noise? *Journal of Applied Ecology* 48:1527–1534.

¹⁴ Christen, D.C., and G.R. Matlack. 2009. The habitat and conduit functions of roads in the spread of three invasive plant species. *Biological Invasions* 11(2):453–465.

cumulative impacts of roads on the natural system are enormous and overwhelming.^{15,16} These are significant impacts, yet they are often overlooked or brushed aside in transportation planning.

Further, the implementation of road infrastructure threatens public health in multiple regards. Vehicle injuries are one of the leading causes of death in the world.¹⁷ Both motorists and non-motorists are affected. Freeways and interstates pose a risk to pedestrians and bicyclists, as these non-automobile users are exposed to hard-to-navigate areas near on and off ramps where vehicles are traveling at higher speeds in areas with restricted visibility.¹⁸ As with wildlife, effects are not limited to just direct mortality. Increased vehicle emissions from freeways can exacerbate numerous health conditions, including asthma, and can increase ground-level ozone production.^{19,20} Additionally, freeways contribute to elevated temperatures through the urban heat island effect, an issue with which many communities in Arizona struggle.^{21,22}

According to the Environmental Protection Agency, transportation—cars, trucks, airplanes, etc.—is the largest emitter of greenhouse gases and emits approximately 29 percent of our nation’s overall greenhouse gas emissions²³. A new freeway will simply further contribute to this problem and is one more reason that a non-freeway option should be considered.

Environmental Impacts of the Recommended Alternative

The proposed corridor and associated infrastructure will negatively affect protected lands; wildlife, habitat, and wildlife-movement corridors; native vegetation and vegetation communities; endangered and special-status species (animals and plants); riparian areas and desert washes; air quality, including to Saguaro National Park (a Class I Area), non-attainment areas, and attainment areas that may be driven closer to non-attainment with the increased traffic associated with a freeway; and implications relative to climate change. These impacts will occur across the life of the project, including during surveying, construction, and implementation and maintenance.

Every attempt should have been made to avoid sensitive lands, riparian areas, important wildlife habitat and movement corridors, special status plants, and archaeological sites, but instead it is as if FHWA and ADOT are targeting some of our most critical and sensitive lands. Potential effects include, but are not limited to, soil disturbance and eradication of plant communities; soil erosion; disturbance of ground-dwelling species, including amphibians, reptiles, mammals, and ground-nesting birds; interference with species that prefer locations distant from roads; effects on species that do not cross open areas; interference with birds and bats, whether migrating or not; and potential for pollution or diversion of waterways.

¹⁵ Balkenhol, N., and L.P. Waits. 2009. Molecular road ecology: exploring the potential of genetics for investigating transportation impacts on wildlife. *Molecular Ecology* 18(20):4151–4164.

¹⁶ Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology* 14(1):18–30.

¹⁷ World Health Organization. 2016. Road traffic injuries. Available online at <http://www.who.int/mediacentre/factsheets/fs358/en>.

¹⁸ Mayors Innovation Project 2013

¹⁹ Frumkin, H., L. Frank, R. Jackson. 2004. *Urban sprawl and public health: designing, planning, and building for healthy communities*. Island Press.

²⁰ Van Vliet, P., M. Knape, J. de Hartog, N. Janssen, H. Harssema, and B. Brunekreef. 1997. Motor vehicle exhaust and chronic respiratory symptoms in children living near freeways. *Environmental Research* 74(2):122–132.

²¹ Hart, M.A., and D.J. Sailor. 2009. Quantifying the influence of land-use and surface characteristics on spatial variability in the urban heat island. *Theoretical and Applied Climatology* 95(3):397–406.

²² Mayors Innovation Project 2013

²³ <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions> , Accessed on July 6, 2019.

Limiting and eliminating negative impacts to wildlife, vegetation, riparian areas, and cultural sites should be a top priority for FHWA and ADOT and cannot be mitigated relative to the Recommended Alternative. Significant efforts have been made within the proposed corridor to maintain large natural open spaces, to protect sensitive and common species, to provide wildlife movement corridors, to eradicate invasive species, and much more. Diverse groups from across the spectrum have collaborated on these efforts. The proposed I-11 corridor will reverse those efforts and negate decades of work among collaborative stakeholders.

The proposed monitoring and mitigation in the DEIS is inadequate and quite frankly, the significant negative degradation of resources associated with the recommended alternative cannot be mitigated.

The DEIS promotes the economic benefits of the proposed I-11, but fails to adequately evaluate economic downside, including its contribution to an unsustainable economic structure and whether the proposed corridor could move the region further away from developing a more sustainable economy. In light of long-term drought, dwindling Colorado River water supplies and an impending shortage, more extreme heat, more extreme fires, and the various implications of climate change, assuming that business-as-usual can continue and that a new major interstate will help the economy, at least in the long-term, is unjustified.

The Recommended Alternative will harm Air Quality

The National Ambient Air Quality Standards (NAAQS) set maximum allowable levels for six criteria air pollutants in order to protect human health and other secondary values, such as public safety. *See* 42 U.S.C. § 7409(b). Particulate matter with an aerodynamic diameter less than 10 microns (PM₁₀) is a pollutant subject to the NAAQS. *See* 40 C.F.R. § 50.6 (establishing the NAAQS for PM₁₀). Both short-term and long-term exposure to PM₁₀ can lead to increased premature mortality, increased hospital admissions and emergency room visits, and the development of chronic respiratory disease.

Construction of and operation of a freeway in this region will exacerbate the already significant and unhealthy levels of PM₁₀ in both Maricopa and Pinal counties, which already have regular exceedances of the health-based standards, and will contribute to greater PM₁₀ issues in southern Arizona. There are also ongoing visibility issues associated with the particulates, which is a secondary consideration under the Clean Air Act. Furthermore, the freeway will contribute to higher ozone levels in the Phoenix-area, which already is in violation of the health-based standard and in Tucson which now appears to be in violation of the ozone standard after exceeding the standard four times in 2018. Each of the build alternatives would significantly increase the vehicle miles traveled. (DEIS at 2-29), and vehicles are the most significant source of pollutants that contribute to ozone formation.

The DEIS should have given more attention to Saguaro National Park as a Class 1 Area and the special air quality protections under Section 162(a) of the federal Clean Air Act.²⁴ Unfortunately, it also neglected to adequately consider those impacts, which are also difficult to mitigate.

The Recommended Alternative will not advance Environmental Justice

²⁴ Environmental Protection Agency. Air quality analysis: Arizona federal class I areas. Available online at https://www3.epa.gov/region9/air/maps/az_cls1.html.

The DEIS does not adequately address environmental justice. It fails to recognize the disparate impact of the detrimental impacts on air quality of the build alternatives and specifically the Recommended Alternative on communities of color and low-income communities.

Communities of color have especially high asthma rates. African-American and Hispanic children visit emergency departments for asthma care more often than white children. Black Americans are 2 to 3 times more likely to die from asthma than any other racial or ethnic group. One in five Hispanic adults can't afford their asthma medicines, and adults who didn't finish high school are more likely to have asthma than adults who graduate high school or college²⁵. Asthma is exacerbated and triggered by pollutants associated with freeways, including particulates and those that will contribute to the formation of ozone.

The disparate impacts associated with climate change are also significant. Researchers at the University of Arizona “. . . found that the southwestern region is a hotspot both for physical climate change and for social vulnerability with a clear ‘climate gap’ between rich and poor. The Southwest is projected to become hotter and drier under future climate change, creating the potential for heightened vulnerability and increasing challenges to achieve [Environmental Justice]. The Southwest exhibits high social vulnerability, with rankings among the worst in the USA on a range of indicators, including poverty, health insurance, energy and food security, and childhood well-being.”²⁶

The Recommended Alternative Will Exacerbate Urban Sprawl

The Recommended Alternative will result in more development in currently undeveloped lands, promoting more urban sprawl and the negative impacts associated with it, including those outlined above. Routing the corridor in this area would itself cause irreparable damage to environmental resources; the subsequent growth spurred in these areas would further facilitate environmental destruction and degradation. Any time a new road is constructed in undisturbed areas, it causes direct wildlife mortality, fragments wildlife habitat, causes or exacerbates air and water pollution, and much more.

Impacts to At-Risk Species

The DEIS fails to fully analyze the impacts to native plant and animal species present in the project area, especially those classified as federally “endangered” or “threatened,” by the state of Arizona as a “species of concern,” and by Pima County as “vulnerable” under the Sonoran Desert Conservation Plan as outlined in comments by the Coalition for Sonoran Desert Protection et al.

Impacts to Specific Areas

The discussion below addresses some of the areas that will especially be affected by the Recommended Alternative. This is by no means a complete list.

South Section

For detailed comments on the impacts to this area, please see the comments submitted by the Coalition for Sonoran Desert Protection and our previous scoping comments. There are a couple of issues we want to highlight, however.

²⁵See <http://www.azdhs.gov/documents/prevention/tobacco-chronic-disease/az-asthma-burden-report.pdf>

²⁶ See http://www.climatejustice.arizona.edu/sites/default/files/Southwest_climate_gap_Wilder_etal_2016_published_version_1.pdf

The Recommended Alternative would traverse the sensitive Avra Valley. Pima County's Sonoran Desert Conservation Plan (a multi-species habitat conservation plan [HCP] agreed to with U.S. Fish and Wildlife Service) requires that habitat values be protected in this area to off-set developments that occur in other areas. A freeway and associated developments would destroy these values and put the HCP in jeopardy. Avra Valley contains Critical Landscape Connections, Important Riparian Areas, Special Species Management Areas, Multiple Use Management Areas, and Agricultural In-Holdings.²⁷ All of these would be compromised, if not destroyed, if a freeway were built here. Furthermore, this route threatens Saguaro National Park, the Arizona-Sonora Desert Museum, and Tucson Mountain Park, including the Central Arizona Project (CAP) Wildlife Mitigation Corridor, which was protected as mitigation for the CAP canal decades ago. A freeway adjacent to these places would destroy their recognized values and have significant negative direct, indirect, and cumulative impacts on the resources they protect.

Central Section

Pinal County has a variety of state parks, designated wilderness areas, and national monuments that could be affected by this Recommended Alternative. This includes Ironwood Forest National Monument, portions of Sonoran Desert National Monument, Picacho Peak, and other protected areas. The two national monuments and their associated designated wilderness areas support abundant wildlife, including several sensitive species, cultural resources, and recreation opportunities. The Recommended Alternative and increased traffic are incompatible with the purposes of these monuments. FHWA and ADOT must carefully consider the direct, indirect, and cumulative impacts to these protected areas.

Sierra Club is concerned about the negative impacts of the Recommended Alternative on Picacho Peak State Park and strongly opposes any new highway alignments in the Picacho Peak area. The construction of a major transportation route west of the Picacho Peak State Park would be detrimental to the park and its visitors and would isolate this little gem from any connectivity to surrounding lands.

The state park is known for its unique geological significance, outstanding and varied desert plants and animals, and its historical importance. The hike/climb to the summit of this prominent landmark is a special accomplishment for all who undertake it. While climbing up the east side of the mountain, one hears the constant hum of truck and car traffic on I-10 and the occasional rattling and whistling of trains. It is impossible to ignore the sound, and the noise reduces the quality of this trek through protected desert. But once the trail crosses the saddle, the west side of Picacho Peak is quiet. A hiker can hear the birds, the wind through the cactus spines, and the natural quiet of the desert. Building a new freeway to the west of the state park (Option F) would destroy this ambiance. It would isolate the state park from all surrounding landscapes making it an island – biologically and culturally. There would be no place to escape the noise and influence of civilization in this formerly tranquil park.

Furthermore, this alternative route is not needed and would be an unnecessary expense. The eastern route (I-10, purple and green alternatives) is currently being upgraded to three lanes in each direction. Miles of new freeway construction west of Picacho Peak is simply unnecessary and ill-advised.

North Section

²⁷ See

http://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf.

The Recommended Alternative for the proposed I-11 freeway in the Phoenix area is not justifiable and will have significant negative impacts on the people, plants and animals of the region.

Maricopa County includes several regional parks, national monuments, and other public lands, wilderness areas, and protected lands that could be affected by this proposed corridor. Special consideration should be given to the Hassayampa River and other riparian and flood-prone areas relative to environmental impacts, as well as public safety. The Juan Bautista de Anza National Historic Trail runs through portions of Maricopa County and could be affected by this proposed corridor. Special consideration and avoidance of parks and wildlands is necessary, and impacts should be thoroughly evaluated, including to Buckeye Hills, White Tanks, and Estrella Mountain regional parks; Sonoran Desert National Monument; Sierra Estrella Wilderness; North and South Maricopa Wilderness, and others. This route will promote urban sprawl in Rainbow Valley and exacerbate the air quality problems for an area already plagued with high ozone and particulate concentrations.

The Recommended Alternative remains the most intrusive route in the Vulture Mountain Recreation Area (VMRA) located near Wickenburg, as the alignment appears to cut off about a quarter of the western end of this regional park. The park's upper Sonoran Desert remains relatively pristine despite past impacts from mining and other uses and continues to hold much biological diversity and natural beauty. According to the 2012 Master Plan for the VMRA, the park is home to many species of wildlife including black tailed rattlesnakes, desert tortoise, Gila monsters, mule deer, javelina, mountain lion, and kit fox. In addition, the park contains an Area of Critical Environmental Concern (ACEC) to help protect several raptor species that utilize the cliffs of the Vulture Mountains. This past year, about 1,000 acres of the eastern part of the park was conveyed to Maricopa County under the Recreation and Public Purposes Act in part to provide additional protection to the perennial Hassayampa River and nearby corridor. The bulk of the park, about 70,000 acres, continues to be jointly managed by the Bureau of Land Management and the County.

Construction of I -11 through the park has further implications. If built, another plan exists for an extension of H 74 in the Morristown area westward across the Hassayampa through the southern part of the park and then connecting with I – 11. Dubbed the Lake Pleasant Freeway, such a scenario would have an end result of riddling the park with freeways, cutting it into sections and greatly blocking wildlife movement and degrading its scenic qualities. This is a significant cumulative and unmitigable impact.

Much time and effort has gone into the creation of this park; its primary purpose is to protect open space and scenic values for recreation. If I-11 is built as proposed, these values would be greatly impaired.

Interstate 11 would cross the Gila River near the community of Liberty, about midway between the Tres Rios Recreation Area and Robbins Butte Wildlife Area. There are remarkable birding and wildlife populations downstream of the 91st Ave. water treatment plant west to Tres Rios. Despite some urbanization, this Salt/Gila segment downstream to Robbins Butte remains a flyway and corridor for wildlife, and should not be unnecessarily interrupted by a busy freeway like I – 11.

The proposed route, once north of the proposed park, would curve to the east side of Black Mountain, bringing the freeway close to Wickenburg Airport where it would eventually join up with US 93. In addition to degrading and fragmenting a large BLM area, the freeway would encourage urban sprawl on the State Trust Lands to the west and north of the county park.

A Rail Only Alternative Should Have Been Analyzed

Sierra Club has long supported a passenger rail line connecting Tucson to Phoenix with stations at key points in between. Such a line could be expanded to other communities along a route tracking the I-10 corridor. A high-capacity passenger rail line is essential for relieving congestion on highways and getting people to their destinations. Such a rail system can also help protect public health, benefit our economy, enhance the human environment, and reduce negative environmental effects by decreasing transportation-related pollution and energy use and by reducing the need to build additional roadways and other infrastructure.

Regarding passenger transport, ADOT's own studies (i.e., passenger rail study) have found passenger rail from Phoenix through Tucson to Nogales in existing rail corridors to be viable. Passenger rail enjoys healthy success in California, Utah, and the Pacific Northwest, and there is no reason to believe it would not succeed in Arizona. In these times of global climate change, rail must be our transportation future – the sooner we begin developing it, the better.

By locating a rail line in an already-developed area, such as along the I-10 corridor, which is already fragmented by the freeway, the needs of I-11 could be met while providing opportunities for safer and more efficient travel. A thorough EIS and evaluation of alternatives is needed to determine the full impacts, however. I-10 is the most commonly traveled route between Tucson and Phoenix and is used by travelers from most of the Phoenix area. Similarly, this route would provide a more direct connection between the Phoenix and Tucson population centers. Following the route that is most commonly traveled could promote ridership as the rail would act as both an introduction and a reminder to users of I-10 that alternative transportation options are available. It also provides more of what is needed to make this successful – mass transit on each end of the line. There is still work to do in these communities, but Tucson and Phoenix have the most developed transit. By placing the rail line through more remote areas, including areas that are not as heavily traveled or through a new corridor, ridership may not be as high. Similarly, by concentrating on areas that are already disturbed, such as along existing freeways or rail lines, damage to environmental resources could be greatly diminished and less infrastructure may be needed.

The DEIS is dismissive of considering rail, inferring that it is already handled. “The Selected Corridor Alternative would parallel I-10 to Eloy and then divert north, entering Phoenix from the east (ADOT 2016). With local and regional transit systems in place within the Study Area, additional passenger rail capacity is not warranted at this time.” (DEIS at 2-11) That is just not true. Additional passenger rail is warranted and needs to be funded. We ask that ADOT drop this I-11 proposal and concentrate on the needed rail between Phoenix and Tucson.

Summary

Thank you again for the opportunity to provide comments on the DEIS developed for this project. FHWA and ADOT appear to be stuck in the past with transportation planning. Sierra Club encourages you to look forward and move beyond outdated transportation solutions that destroy habitat, harm communities, and continue to give us unhealthy air quality. FHWA and ADOT must seriously consider whether this project is necessary and appropriate or whether it is being pushed forward based on outdated and inaccurate data and needs. Negative impacts to our state's diverse natural resources are unavoidable with a project of this magnitude, and mitigation efforts will not adequately offset the direct, indirect, and cumulative negative effects. We expected a thorough analysis of the impacts and a hard look at the full range of reasonable alternatives, including those

that do not envision a freeway and its associated infrastructure. Unfortunately, FHWA and ADOT did not provide that. We encourage you to withdraw this proposal and go back and evaluate non-freeway alternatives.

FHWA and ADOT should break with tradition and offer fresh alternatives that focus on some of the real issues facing the 21st century such as retention of large important open space areas and reduction of fossil fuel consumption to improve air quality and limit climate change. To this end, I-11 is a monumental distraction, encouraging the very things we need to put to rest. We recommend that FHWA, ADOT, and their partners instead study other methods of moving people and freight from Nogales north across Arizona to our neighboring states.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandy Bahr", with a stylized flourish at the end.

Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter

Denise Baldwin, MBA
Licensed Fiduciary
22 E. University Blvd.
Tucson, AZ 85705
520-390-5680

May 7, 2019

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

Re: Comment I-11 Draft Tier 1 Environmental Impact Statement

To Whom It May Concern:

I am a lifetime resident of the Tucson Mountains and board member of Tucson Mountains Association. This proposed project creates the most harm to the Tucson quality of life, economic tourism that relies on visits to the desert areas that will be impaired as well as many others. My comments will be limited to a few points.

First, the only acceptable route is a reduced footprint that follows I-10 through Tucson or NO OPTION.

Second, Due to lack of time, the present process demands educated opinions. I offer a resounding NO.

This route brings current and future risks to the entire Tucson Mountains, and the Four Jewels of the area: Tucson Mountain Park, Saguaro National Park, Ironwood National Monument and Kitt Peak National Observatory. Pollution, noise and infill will harm the desert areas and light pollution will impair scientific discovery at Kitt Peak.

Third, The May 6, 2019 UN report from 500 experts in 50 countries by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) has guidance: our footprint does not need to be extended and our four jewels need to be protected.

The study found that reckless development and human decisions are pushing the natural world to the brink. The human footprint is so large there is hardly room for anything else. I-11 in Avra Valley is an example of unrecoverable needless expansion of a footprint.

Tier 1 EIS Study Team

Page 2

May 7, 2019

Four IPBES findings ask whether I-11 in Avra Valley will be another human decision that pushes our society and our Four Jewels to the brink, specifically:

1. The world's biodiversity is rapidly vanishing.
2. The biggest threats to wildlife are habitat loss, climate change and pollution.
3. Animals and plants are disappearing and so is the land they rely upon for natural habitat.
4. Habitat conversion drives biodiversity loss. Only a 25% of land on Earth is free of the impacts of human activities. This is projected to decline to just 1/10 by 2050.

I-11 in Avra Valley cannot be a shortsighted decision that harms our natural and societal future. Given the choice, we can be smarter. I ask: Protect the Four Jewels as many of our great leaders over the past 100 years have done. They knew the area was important enough preserve and protect. The living world depends on your thoughtful consideration.

No to I-11 in Avra Valley. Choose the Orange Route along I-10, or nothing at all.

Respectfully submitted,

Denise Baldwin
Tucson Mountains Association
Board Member



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

We live 2 miles from the proposed route, and are against it!!! The reason we moved to Arva Valley was for peace and quiet, and not living close to neighbors. It will destroy the habitat that exists here and will exist here for another 1000 years.

Contact Information (optional)

Name Mr. & Mrs. Michael Barber Email pattybarber50@gmail.com
 Address 16842 W. El Camino De Tres Arroyos
 City Marana State AZ ZIP 85653

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有关中文信息, 请致电 1-844-544-8049.

CONTACT

MAIL: I-11 Tier 1 EIS Study Team • c/o ADOT Communications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S

i11study.com/Arizona



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

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When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

I THINK THE I-11 EXPRESSWAY/HIGHWAY
IS A GREAT IDEA. MY ONE SUGGESTION
WOULD BE TO FAST TRACK THE CONSTRUCTION
OF HIGHWAY TO HELP ALLEVIATE TRAFFIC
CONGESTION ON I-10.
THANKS FOR ALL YOUR GOOD WORK.

Contact Information (optional)

Name BOB BARBOUR Email _____

Address 13521 South 192 Ave

City BUCKEYE State AZ ZIP 85326

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**Interstate 11 Corridor Tier 1 Environmental Impact Statement
Nogales to Wickenburg****YOUR INPUT IS IMPORTANT • SU OPINIÓN ES IMPORTANTE**

Please Print • Por favor, imprimir

General Comments • Comentarios Generales

I am against I-11. It will separate family & friends. We live in the Picture Rocks near Sandario & Mile Wide.

35 years, 25 trees later with 4 generations and 3 homes within a half a block from each other.

We moved here to get away from freeways city and noise. I-11 will bring it all in on top of us, including higher taxes.

Put I-11 on top of I 19 + I 10 -.
Have drive through tracks to drive at night.

There are a lot of alternatives to I-11 instead of AVRA Valley.

Name • Nombre Doris Barry Email • Correo Electrónico: _____Address • Domicilio 1871-N. Camino AvraCity • Ciudad Tucson AZ. State • Estado _____ Zip • Código Postal: 85743**Contact • Contacte**

MAIL: Interstate 11 Tier 1 EIS Study Team | c/o ADOT Communications | 1655 W. Jackson Street, Mail Drop 126F | Phoenix, AZ 85007

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingual) | PROJECT WEBSITE: i11study.com/Arizona

July 8, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson Street, MD 126F
Phoenix, Arizona 85007

Dear Sir or Madam:

Thank you for the opportunity to provide comments on the Tier 1 Draft Environmental Impact Statement (DEIS) for the Interstate 11 Nogales to Wickenburg proposal. I am resident of Tucson, Arizona, and am very concerned about the analysis in the EIS that supports the recommended alternative.

I fully appreciate the need for the protections afforded by what is traditionally called the “4-F” Transportation Act provision. However, the implementation of any law can be mishandled if it is not interpreted with sensitivity in the light of public opinion and common sense. “Feasible and prudent” is not a single phrase; it is two separate criteria. In this case, the FEIS fails to appropriately analyze the prudence of the recommended alternative.

At one of the public meetings that I attended, a consultant who was part of the EIS team told me that the recommended alternative was chosen because it resulted in the least amount of adverse impacts. Frankly, that person looked a bit embarrassed when saying that because it followed hours of public testimony in which virtually every speaker vehemently opposed the recommended alternative because of the high level of adverse impacts to the environmental, social, cultural and economic well being of the affected area. Both Pima County and the City of Tucson as well as our elected representatives have made the problems with the recommended alternative clear.

While the recommended alternative may well be “feasible” from a technical, engineering perspective, I do not think it is “prudent”. Indeed, I believe that the 4(f) analysis is significantly flawed in relationship to the analysis of whether the recommended alternative is “prudent”. I understand that a mechanical application leads one to conclude that the most number of 4(f) properties that would be adversely affected among the alternatives presented would be the alternative that builds on I-19 and I-10. But 4(f) analysis is supposed to go deeper than counting properties and the quality of the 4(f) analysis here is open to serious challenge. Besides important technical issues about the analysis of the impacts on the properties on all of the alternatives, the 4(f) analysis in the DEIS fails to seriously analyze the question of prudence. As you know, an alternative is not prudent, under the applicable regulations, if, after reasonable mitigation, it still causes: severe social, economic, or environmental impacts; severe disruption to established communities; severe impacts to environmental resources protected under other Federal statutes; and if it causes other unique problems or involves other unusual

factors – **or** – if it involves multiple factors involved above that while individually might be minor, cumulatively cause unique problems or impacts of extraordinary magnitude. This is pretty much a perfect description of what you have heard over and over from citizens and their elected representatives about the recommended alternative. The recommended alternative involves all of these unacceptable impacts, along with possible disproportionate impacts to low income populations in Avra Valley and much higher construction costs.

The Tucson and Avra Valley community has spoken loudly and clearly against the recommended alternative. It is neither prudent nor wise. Efforts to proceed with the recommended alternative to Tier 2 will be blocked at every possible point. I urge you to take the comments you are receiving seriously and to go back a step to do a supplemental EIS on the two alternatives that have the most popular support – either expansion of I-19 and I-10 or a rail alternative.

Sincerely,

s/Dinah Bear

Dinah Bear

I-11 Joint Stakeholder Community Planning Group

I-11 Position Statement

At the invitation of the Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA), representatives of several stakeholder organizations recently participated in a process to explore two alternative routes for the proposed Interstate 11 through Pima County. The stakeholders were convened in two separate groups, corresponding to the two alternatives being considered: (1) a new bypass freeway through Avra Valley and (2) expanding I-19 / I-10 through the city center. We appreciated being offered the opportunity to explore these routes and discuss the impacts and opportunities associated with each. As part of the federal NEPA Scoping Process, the two groups met separately in March and April, for a total of 9 hours for each group. However, after the scoping meetings ended, members of both groups concluded that more meaningful input could be provided to the federal and state agencies if they continued to meet as a joint group to evaluate impacts and opportunities of both corridor alternatives. As such, members of these two stakeholder groups are now working together, and we have arrived at several important conclusions, which we highlight here.

The undersigned representatives of both groups of stakeholders agreed that of the two routes proposed for a future I-11 highway, the expansion and reconfiguration of the existing I-10 and I-19 corridor is the only acceptable route. A bypass through Avra Valley is not acceptable.

Any further consideration of the Avra Valley option must take into account not only the input from both stakeholder groups but also the concerns of the Tohono O'odham Nation, whose land it impacts.

There appear to be significant shortcomings associated with the federal review process that focuses on new highway construction. Nevertheless, we believe that there could be a significant opportunity to address some of the historic negative consequences that resulted from the construction of I-10, which physically divided our community and diminished the quality of life of our downtown and other neighborhoods along the highway.

Instead of simply adding new lanes to our existing highway, we should consider redesigning portions of it—either going underground or suspended—so that we can reconnect our city. Moreover, focusing on new highway construction overlooks other less costly options that would encourage the free flow of goods. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;
- Technologies that improve traffic flows;

- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

Assessing the cumulative impacts of these options on congestion should be considered before contemplating either a bypass or an expanded I-10. In addition, the following studies must be completed, with the results communicated to community stakeholders and incorporated into the decision process early on.

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the project. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Santa Cruz River.
- Social and economic equity impacts.

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any build alternative.

Furthermore, we strongly encourage ADOT and FHWA to refer to the I-11 Super Corridor study final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Utilizing such studies and designs would help us reduce impacts in our downtown and surrounding areas.

We believe that our community stands to benefit economically from increased trade between the United States and Mexico, and our location means we have much to contribute to and benefit from a vibrant trade corridor. However, we must not let a failure of vision and a lack of attention to practical options limit how we respond to the potential economic opportunities associated with the Interstate 11 proposal(s).

We also believe that civic and business organizations, including the groups we represent, should take the initiative to further explore these and other options available

to us, including a congestion-relief study that would model realistic and less costly options to improve the flow of goods through town, a community design charette that illustrates how we might redesign I-10, and an economic benefits study focused on the facilitation of moving goods through the center of the city and the reconnection of downtown areas now divided by the existing freeway.

In the months to come, we will be reaching out to business and civic leaders to secure their involvement and support in these efforts. By working together, we can we make our community a better place to live, work, and trade.

We appreciate the opportunity to have participated in the ADOT/FHwA stakeholder process, in order to provide valued input into this transportation proposal.

Thank you.

Carolyn Campbell and Christina McVie
Coalition for Sonoran Desert Protection

Helen Erickson
Erickson Terrascope

Robin Clark and Ross Maynard
Avra Valley Coalition

Nicole Gillett
Tucson Audubon Society

Demion Clinco
Tucson Historical Preservation Foundation

Tom Hannagan and Gene McCormick
Friends of Ironwood Forest

Gene Einfrank
Menlo Park Neighborhood Association

Joseph Iuliano
Drachman Institute

Kevin Dahl
National Parks Conservation Association

Terry Majewski
Statistical Research

Fred Stula
Friends of Saguaro National Park



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

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- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

Before ~~then~~ we moved to Goodyear, we stopped at the Goodyear City office to ask about highway extensions. The lady we talked to showed us on a map where the proposed highway would be. It was further away from our community of Costa Mesa than the Purple alternative. We would support the Green Alternative.

Contact Information (optional)

Name Craig & Nancy Benson Email Craig.benson12345@icloud.com
 Address 17516 W Liberty Ln
 City Goodyear State AZ ZIP 85338

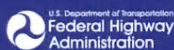
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有关中文信息, 请致电 1-844-544-8049.

CONTACT

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4-3-2019



Interstate 11 Corridor Tier 1 Environmental Impact Statement Nogales to Wickenburg

YOUR INPUT IS IMPORTANT • SU OPINIÓN ES IMPORTANTE

Please Print • Por favor, imprimir

General Comments • Comentarios Generales

Come on Arizona! Instead of being shmoozed by rich men with personal gain interests why don't you show a measure of pride and good conservatorship? We have unique flora and fauna not seen anywhere else in this world. We have a diversity of strong people with long familial ties to our land. Our local and state government HAS GOT TO WAKE UP and make preservation its forefront goal when considering any construction - especially in TUCSON!

We do not want to become another Phoenix! Moving interstate traffic away from our existing I-10 will have devastating effects on Tucson. We will lose business along the I-10 freeway as more people will consider a bypass route as being faster. The cost of building this bypass far exceeds any benefit Tucson will realize. But the alternative of improving I-10 for bypass benefits not only preserves our precious desert, it costs us FAR LESS than the I-11 proposal. To me, there is no argument that makes I-11 sense.

Name • Nombre Angela Besemer Email • Correo Electrónico: abcs85754@aol.com
Address • Domicilio P.O. Box 86154 12252 W. Calle Madero
TUCSON AZ 85743
City • Ciudad TUCSON State • Estado AZ Zip • Código Postal: 85754

Contact • Contacto

MAIL: Interstate 11 Tier 1 EIS Study Team | c/o ADOT Communications | 1655 W. Jackson Street, Mail Drop 126F | Phoenix, AZ 85007

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For saving 1 hour of driving time why waste the beautiful landscape.
Living out in Pima Valley is peaceful, beautiful landscape, as we get more traffic, noise, accidents, crime etc. This is a waste of tax payers money. Repair the roads we have.
Lottery money, higher taxes used up to pay for our roads but every election you are asking for more funds for the roads where did the money go?
Why not improve the I-19 instead of ruining the desert. Every where you look more and more of the natural desert is being built up for homes, offices (over)

Contact Information (optional)

Name Hudrey Bidsman Email _____
Address 5565 N Pima RD _____
City Marana State AZ ZIP 85653

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PROYECTO DE DECLARACIÓN DE IMPACTO AMBIENTAL DE NIVEL 1 DE LA INTERESTATAL I-11 Y EVALUACIÓN PRELIMINAR DE LA SECCIÓN 4(f) (PROYECTO DE EIS DE NIVEL 1), de Nogales a Wickenburg

FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de comentarios públicos sobre el proyecto de declaración de impacto ambiental de nivel 1 de la I-11.

El Departamento de Transporte de Arizona (ADOT) y la Administración de Autopistas Federales (FHWA) invitan a todas las partes interesadas a enviar sus comentarios sobre cualquier aspecto del proyecto de EIS de nivel 1. ADOT y FHWA tendrán en cuenta todos los comentarios al preparar la versión final de EIS de nivel 1, que incluirá las respuestas a todos los comentarios recibidos durante el periodo de comentarios sobre el proyecto de EIS de nivel 1 e identificarán una alternativa preferida (una alternativa a favor de la construcción o la alternativa en contra de la construcción).

Al enviar sus comentarios, sea lo más específico posible y proporcione detalles sobre sus inquietudes y recomendaciones.

A ADOT y FHWA les resulta útil recibir comentarios sobre:

- cualquier alternativa o medida de mitigación que usted apoye o no apoye, y por qué;
- el análisis del impacto ambiental y el rendimiento de las alternativas;
- la información que cree que está incompleta o es incorrecta

Escriba sus comentarios en letra de imprenta a continuación. Los comentarios se deben recibir o sellar antes del 8 de julio de 2019.

(that there are empty buildings already)
 why destroy?
 Save our deserts NO more highways
 so the drug traffic can be spread
 faster to Northern Arizona, Utah, Nevada
 etc.
 Reconsider this Highway I-11
 we say NO Keep our
 deserts NO Highway
 Preserve what we have

Información de contacto (opcional)

Nombre _____ Correo Electrónico _____

Dirección _____

Ciudad _____ Estado _____ Código Postal _____

De acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés) y otras normas y leyes antidiscriminatorias, el Departamento de Transporte de Arizona (ADOT) no discrimina por motivos de raza, color, origen nacional, sexo, edad o discapacidad. Las personas que requieran asistencia (dentro de lo razonable), ya sea por el idioma o por discapacidad, deben comunicarse con Laura Douglas al teléfono 602.712.7683 o a ldouglas@azdot.gov. Las solicitudes deben presentarse lo antes posible para permitir que el Estado tenga la oportunidad de disponer las medidas necesarias.

如需中文文件请致电 1-844-544-8049

CONTACTO

CORREO POSTAL: Equipo del estudio de la EIS de nivel 1 de la I-11 • a/c Comunicaciones de ADOT • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007

CORREO ELECTRÓNICO: i-11ADOTStudy@hdrinc.com | **TELÉFONO:** 1-844-544-8049 (línea gratuita/bilingüe) | **SITIO WEB:** i11study.com/Arizona

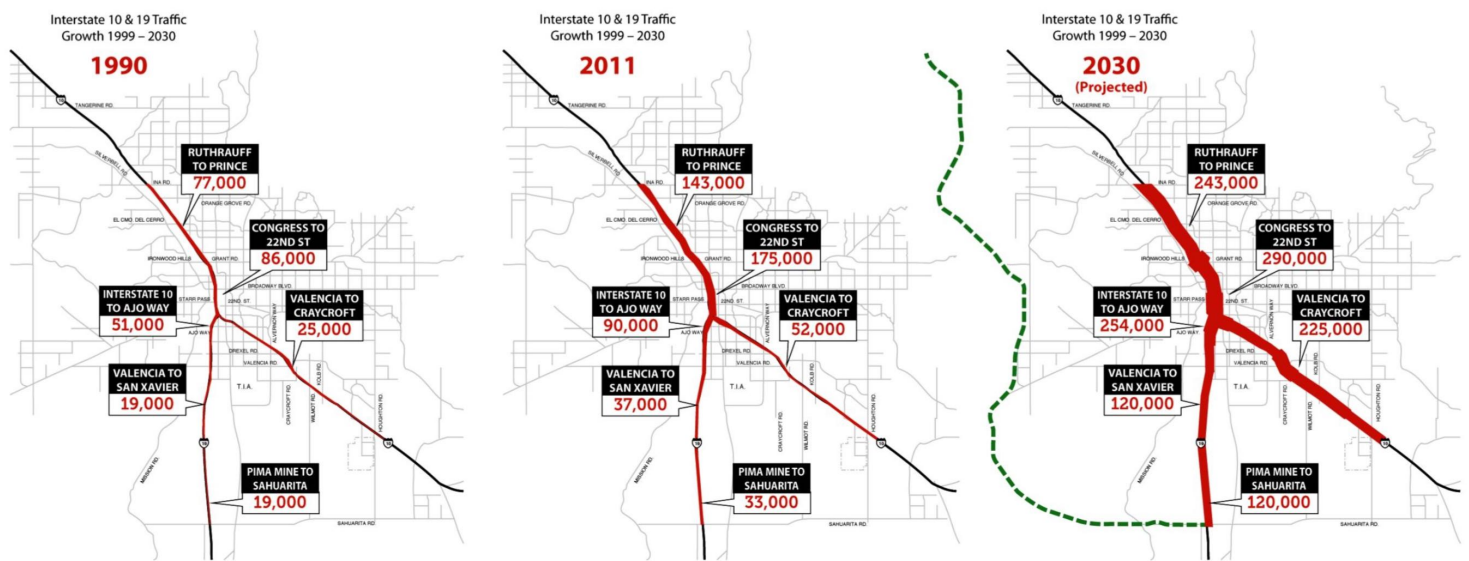


N.º de proyecto de ADOT 999 SW 0M5180 01P | Subvención federal n.º 999-M(161)S

i11study.com/Arizona

Why a new transportation and trade corridor?

Interstate 10 Traffic Growth 1990 – 2030



The I-11 Draft Tier 1 Environmental Impact Statement
and Preliminary Section 4(f) Evaluation

PROPOSED I-11 CORRIDOR
THROUGH THE
ALTAR & AVRA VALLEYS
COMMENTS & ARGUMENTS WITH SUGGESTED ALTERNATIVES

SUBMITTED BY

Joe Boogaart
jd.boogaart@gmail.com
520-561-5262
PO Box 1712
Cortaro, AZ 85652
July 6, 2019

Joseph D. Boogaart
9978 N Blue Crossing Way
Tucson, AZ 85743
July 5, 2019

I-11 Tier 1 EIS Study Team,
c/o ADOT Communications
1655 West Jackson Street, Mail Drop 126F
Phoenix, AZ 85007

Dear Members:

I have a number of concerns with the team's I-11 preferred and alternate corridor recommendation. Unable to fully express these reservations at the public hearing, I herein submit them for your consideration.

The U.S. is twenty-two trillion dollars in debt. There is no way to pay for this or any other infrastructure project, but through issuing more debt. I would on principle alone oppose I-11 construction until existing deficiencies are addressed and corrected.

Acknowledging that addressing debt is not now, nor will it ever be a priority of a body of nationally elected officials, I respectfully submit my reservations and objections to the current recommendation of the I-11 Tier 1, EIS Study Team and submit an alternative.

Sincerely,



Joseph D. Boogaart

Enclosures:

Argument
Footnotes
Corridor Map
Personal Profile

I-11 METRO TUCSON BYPASS PLAN

ALTAR AND AVRA VALLEYS

CURRENT I-11 STUDY TEAM ALTERNATIVES

PIMA COUNTY

UNDERLYING FACTS

ECONOMIC

- Less than 10% of the land in Pima County is private, much of which has been developed.
- Every alternative submitted by the I-11 study team uses private land (where available) as the preferred route.^[13.1]
- Revenue from property tax accounts for 40% of the total Pima County budget^{9]}
- Removing land from the tax rolls in this way will shift the tax burden onto the remaining landowners.
- Pima County currently has the highest property taxes in the state.^[11]
- By definition, I-11 is to be a restricted access commercial corridor between Mexico and major metropolitan areas to the north and west.

ENVIRONMENTAL

- Southern Arizona depends on the Altar and Avra Valleys as major resources for water.^[6]
- The upper alluvial stratus of Avra Valley is a major producer of water.^[6]
- The Avra Valley depth of the upper alluvial stratus ranges from 100' to 1000'^[6]
- Proposed routes for I-11 pass directly over some of the most environmentally sensitive recharge areas and reserves in Pima County.^{[10] [6]}
- The City of Tucson owns water rights^[12] and the Town of Marana stores water in the valley aquifer.
- The City of Tucson, Tucson Water, Arizona Game and Fish, National Park Service, The Avra Valley Coalition and other environmental groups have voiced concerns over the routes being proposed in the I-11 Draft Tier 1 Environmental Impact Statement and evaluation.^[12]

RESULTS of placing I-11 through the Altar and Avra Valleys.

ECONOMIC and ENVIRONMENTAL

- I-11 will act as a barrier for the natural migration of wildlife between the east and west valley.
- Restricted access will require costly overpasses, hindering well planned development.
- East-West flow of traffic within the valley will be impeded, thus encouraging strip development on either side of the interstate.
- I-11 could create logistic problems for Green Valley, Sahuarita, City of Tucson, Town of Marana and Pima County in the movement of water to urban growth areas.
- Having unrestricted commercial cargo haulers passing through the valley creates the possibility for accidental groundwater contamination.
- The purpose of I-11 was to establish a bypass for trucks and passengers traveling from Mexico to San Diego, Phoenix, LA and other major northern metro areas^[10]. Other than relieving congestion on I-10, such a bypass would only benefit northern and western major metro centers. The positive financial impact, if any, to Metro Tucson would be minimal. Thus, the economic and environmental negatives that will impact Tucson need to be the primary consideration for the placement of I-11 through northern Pima County.

ARGUMENTS IN SUPPORT OF A WESTERN REALIGNMENT OF I-11

FACTS AND OBSERVATIONS USED AS A BASIS FOR THE SUGGESTED ALTERNATIVE ROUTE.

1. The I-11 placement through Pima County is not critical to its purpose, which is to serve as a connector between Mexico and major metropolitan areas and markets.
 - I-11 is to be a Tucson bypass to relieve future congestions on I-10.
 - Metro Tucson does not meet the definition of a major metropolitan area or market, which is 1,000,000 in population, as defined by 2012 U.S. Census Department.
2. The I-11 team study area varied from 10 miles to 25 miles wide ^[10.7]
3. Route alternatives were the choices of the study team, not a consequence of limitations and restrictions.
 - Tribes did not respond and were arbitrarily left out of the study. This statement implies that no additional effort was made to involve the tribes and garner their opinion/feedback.
 - State and federal lands were avoided where able. I-10 crosses both as well as tribal lands multiple times between Nogales and Phoenix.
4. Union Pacific is in the feasibility/ planning stages of placing a terminal “intermodal inland port” on state land north of Picacho Peak near Eloy.
5. A deep-water port is planned in Guaymas Mexico which will accommodate the super cargo ships. ^[14]
6. Super cargo ships are able to carry 18,500+ TEU’s. (TEU = 1 20’ container)
7. Efficient access will be needed from the Port of Guaymas to markets in the United States.

Environmental

8. Buffelgrass is possibly the greatest threat to the southwestern high desert. It is an invasive species that crowds out native plant life and replaces sparse vegetation with a highly flammable carpet endangering unique wildlife and plant species. ^[5]
9. Ironwood Forest is:
 - a known transitory corridor for illegal migrants and drugs. ^[4]
 - a popular area for ATVs, gun owners and teenage partying. ^[4]
 - commonly used for illegal dumping
 - in constant jeopardy due to insufficient funding and the manpower needed to patrol and maintain the national monument. ^[3]

THE ARGUMENT (See amended map)

The following proposal fits well within point 2 above and has the potential to mitigate the problems described in 8 and 9. It also relieves the negative economic and environmental impacts as described on the previous page.

The same bullet point headings that the study team uses as justification for a new highway are used here to state the case for moving the I-11 corridor to the west.

A significant point not addressed and of little importance to the stated objectives of the study is the increased environmental risk to the Sonoran High Desert if I-11 passes through rather than around the Tucson Metro area.

- Population and employment growth
 - Relocating I-11 west would improve the potential for both population growth and employment opportunities by eliminating the strong possibility of a restricted access barrier through both valleys.
 - Shifting I-11 over 14 miles to the west of Avra Valley will not affect the positive economic impact to temporary construction jobs.
- Congestion and travel time reliability
 - This proposed corridor is more direct and accommodates a very restrictive access. It will prove to be

more reliable, less congestive and safer. Total distance from Amado to I-8 would be 90 miles.

- If a frontage road is required, then passing west of the greater Tucson metro area will eliminate shared use of the frontage road and many time consuming intersections, Thus, making I-11 more reliable in the long run and cut travel time in case of closures or national emergencies.
- El Paso is the most westerly rail port willing and able to handle cargo coming from a Guaymas deep-water port. An intermodal inland port near the confluence of I-8, 10 and 11 would be a game changer. Southern Arizona will quickly become the 'port of entry' of choice. That will create an exponential increase in I-11 traffic.
- System linkages and regional interstate mobility
 - Currently I-19 serves Tucson from Mexico. This will not change. There is no need for I-11 to serve Tucson, and by the committee's definition, Tucson is not a major metro area. Therefore, having I-11 passing through the metro area would only be an unnecessary intrusion.
 - When the Union Pacific Terminal "intermodal inland port" materializes, having the Marana exit moved to the Eloy area would enhance system linkage. Interconnectivity between rail and Interstate highways 8, 10 and 11 would have a huge economic impact on the region.
- Access to economic activity centers

Moving I-11 to the west as shown on the amended map will have zero effect on access between the Mexican border and points north.
- Homeland security and national defense.
 - Both agencies would be better served by an expressway around future growth of a metro area when an interstate already exists along the edge of current metro area.
 - An interchange south of Eloy and near a Union Pacific intermodal facility would give full access to rail and truck service throughout the United States especially and most importantly in national emergencies.
 - I-11 passing up through a known drug and human smuggling corridor could enhance surveillance in an area understaffed and underfunded.
- Sonoran High Desert Ecosystem
 - As mentioned in 'Facts and Observations', the greatest danger to the Sonoran desert is Buffelgrass. Having I-11 pass along the edge and through a 3-mile neck of the Ironwood Forest would put the national monument under the surveillance of 1000s of truckers a day. A few signs stating: "SAVE OUR DESERT", "REPORT WILDFIRES AND ILLEGAL ACTIVITY" would help fill the void due to underfunding and understaffing and could possibly save Ironwood Forest itself from a disaster.
 - Disallowing ingress and egress along and through tribal and national monument land from highway 86 to Eloy would minimize damage to the environment and honor our Arizona heritage.
 - Strategic placement of 3-4 ft. culverts would allow east-west migration of wildlife while restricting access to off road vehicles of any kind. Six ft. culverts with restrictions would allow hikers, horse riders and non-motorized vehicles access.

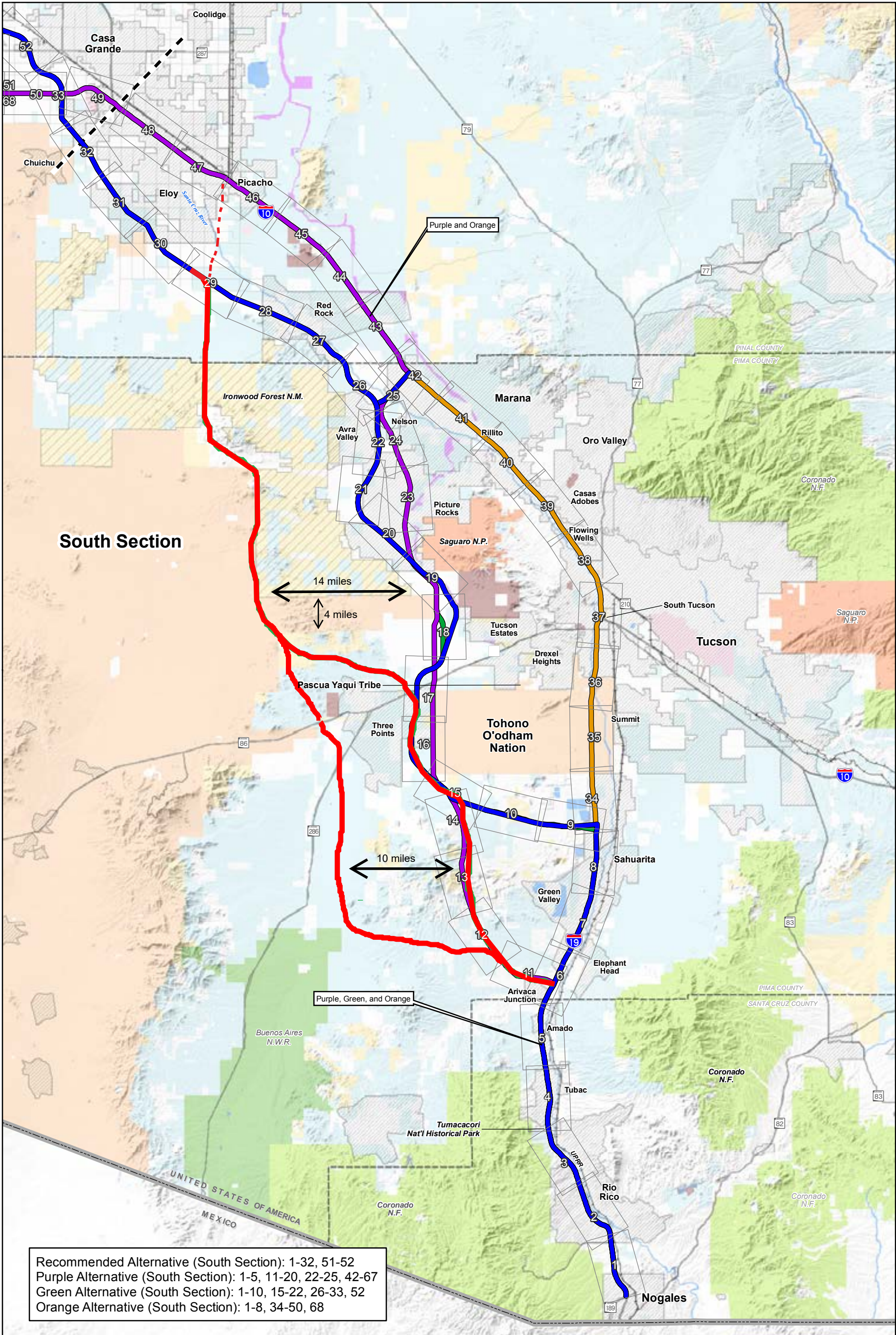
In summation, there are ample reasons why an interstate should not pass through the Avra Valley and more reasons why moving it to the west is a smarter solution. At this point, as stated in the I-11 Draft Tier 1 Environmental Impact Statement and Evaluation, the process must go through additional tiers and reviews. Funding must be identified^[15] before a decision is made whether to proceed or terminate the project. Rational thinking would dictate that it will be 10 or 20 years out before the 1st dirt is turned. In that time the valley's character will have changed. Moving I-11 to the west will remove it from the path of potential growth and minimize controversy in the future.

I-11 METRO TUCSON BYPASS PLAN

FOOTNOTES

- [1] Brian Pedersen, Daily Star, Sept. 4 2010
- [2] September 21, 2010 at 6:51 PM MST MST - Updated June 21 at 10:17 PM, By Som Lisaius, KOLD News
- [3] Mitch Tobin April 14, 2003, Highway Country News.
- [4] <http://ironwoodforest.org/about/the-monument/threats>
- [5] <http://www.desertmuseum.org/buffelgrass/>
- [6] <http://www.azwater.gov/azdwr/StatewidePlanning/WaterAtlas/ActiveManagementAreas/PlanningAreaOverview/Groundwater-TucsonAMA.htm>
- [8] https://en.wikipedia.org/wiki/Altar_Valley.
- [9] http://webcms.pima.gov/government/county_budget/
- [10] I-11 Corridor study overview, paragraphs ,1-9
- [11] <https://news.azpm.org/p/news-splash/2018/4/5/126911-report-pima-county-has-highest-property-tax-rate-in-arizona/>
- [12] Arizona Daily Star, Joe Ferguson & Shaq Davis, April 22, 2019
- [13] I-11 Map Book.pdf
- [14] https://tucson.com/business/local/port-of-guaymas-set-to-double-its-capacity-seeks-arizona/article_16947664-811b-56eb-b67a-abf186bac8c7.html
- [15] In areas of eastern United States, interstates are monetized. I-11 will be a convenience to truckers saving time, fuel and the aggravation and inefficiency by avoiding the congestion of urban slow and go traffic. A toll for this portion of I-11 will help fund the system. Using E-pass billing as used in Florida will eliminate inconvenience.

The entities used as references have been provided a courtesy copy of these documents.



PROFILE

JOSEPH D. BOOGAART

9978 N. Blue Crossing Way
Tucson AZ, 85743
(520) 561-5262

EXPERIENCE

PRIVATE SECTOR

Owner - Current

Blue Crossing Investors, LP
9978 N Blue Crossing Way
Tucson Arizona, 85743
January 2011 - Present

President

Peerless Plants of Florida, Inc
1994 – 2000
Apopka Florida

President

Florida Plant Growers Cooperative
1987 – 1994
Apopka, Florida

President/Owner

Boogaart's Nursery Inc.
1974 – 2000
Apopka, Florida

CIVIC INVOLVEMENT

Pima County Bond Advisory Committee member
2013 - Current

City of Apopka, Florida

Planning and Zoning Advisory Committee
1999 – 2000

Foliage Sertoma

President

1997 – 1999

Farm Bureau, Orange County Florida

President

1984 – 1986 Approximate dates

Orange County Florida

Member:

- Planning and Zoning Commission;
- East Central Florida Planning Council;
- Primary Water Control Board;
- Long Range Planning committee 5 & 10 year update.

1980 – 1990

Throughout the 1980's.

Florida Foliage Association

Treasurer

1979 – 1980

Date Approximate

PATENTS

Support System for Potted Plants United States US4381838

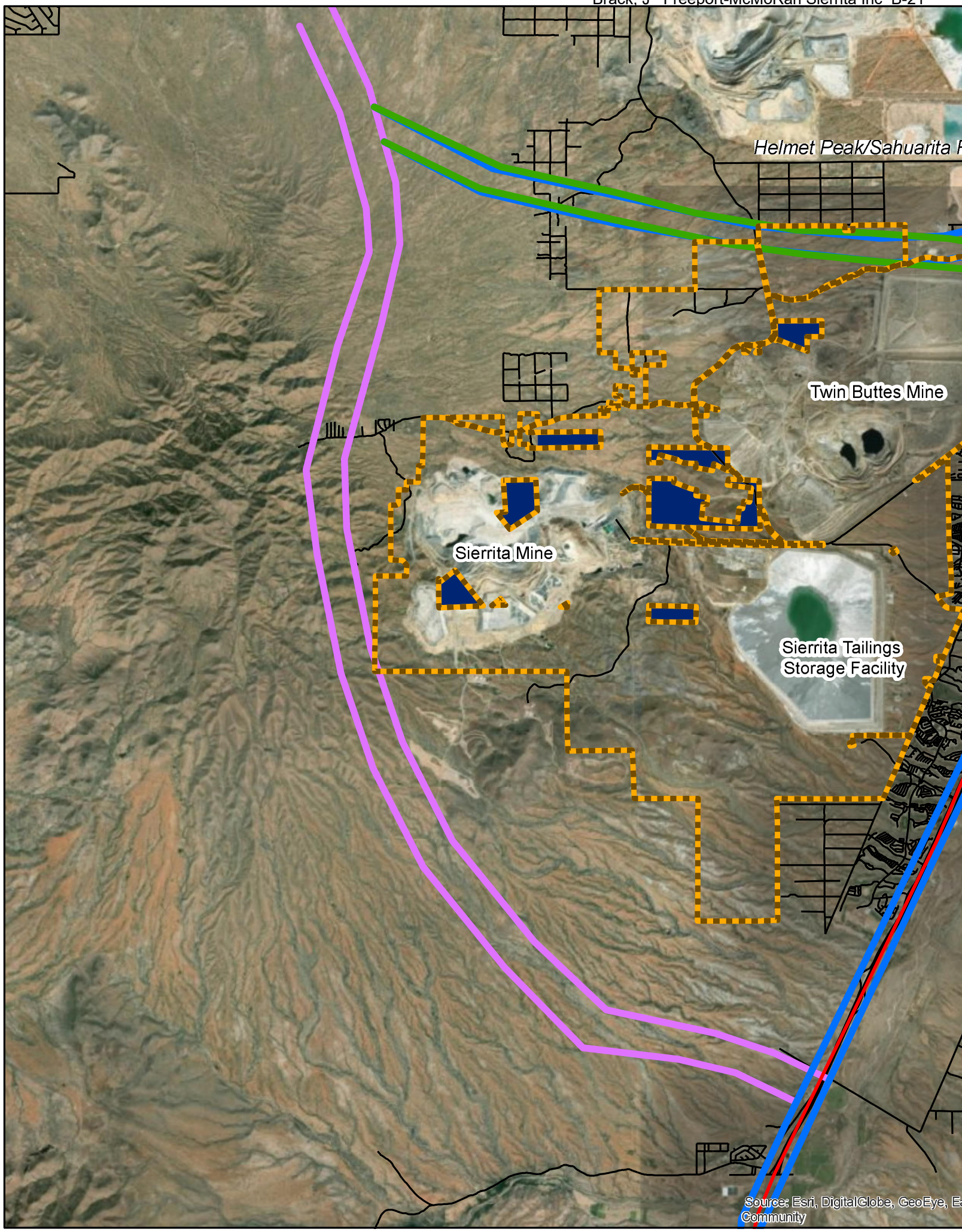
Issued May 3, 1983 A system using wires under tension to support plants vertically.

EDUCATION

University of Arizona (attended)

International Marketing

1963 – 1968



Helmet Peak/Sahuarita P

Twin Buttes Mine

Sierrita Mine

Sierrita Tailings
Storage Facility



Interstate 11 Corridor Tier 1 Environmental Impact Statement Nogales to Wickenburg

YOUR INPUT IS IMPORTANT • SU OPINIÓN ES IMPORTANTE

Please Print • Por favor, imprimir

3-29-2019

General Comments • Comentarios Generales

It is with much skepticism that I am submitting this I-11 Input Information Form given out by ADOT, as I am quite certain it will never be read, paid any attention to, thought provoking to consider, or even see the light of day once it is in ADOT's hands except to fulfill the Govt's requirements that you 'reached out to the communities most involved in this tragic idea' of putting I-11 through Avra Valley, and be able to check off that box in their study, but.... my conscience tells me that you ought to hear from those, whose lives are to be greatly impacted on, so I will state my opinions on behalf of my entire family, my neighbors and friends here in Avra Valley, as this has been my home for the last 32 years! I have raised my children, my grandchildren and my great grand children right here at **12250 West Calle Madero, the exact location you are planning to develop an Interstate straight thru my property!** Your reason being: So a truck route to transport goods between Mexico and Canada"!!!! Why here? Avra Valley is a wonderful quiet, secluded valley where no air, water, noise or light pollution exists, where our children hold dear and believe this to be a special place to visit often and just to get away from the big cities they now work in. Our parks, Saguaro National, Tucson Mountain Park with its designated hiking trails all along the Sonoran Desert, why would you even consider destroying all of this when there are so many other options available? Our wildlife would disappear, and in fact as of this writing I am watching a pair of hawks raising their young in a tree just across our dirt road, they have done this for the past 6 years! I can assure you the tourist attractions nearby, (Desert Museum, Old Tucson and the bike trails along the Tucson Mountains, namely the John McCain Loop), would all suffer from the pollution created by large semi trucks, doesn't this mean anything to you people at ADOT? There surely must be better options than this route, and have heard that double-decking an Interstate over I-10 to allow truckers non-stop passage thru Tucson was an option and was, by far, so much less money to accomplish and implore you to once again consider this option and not destroy my home. Hopefully, somebody could give me a good reason why not.

J.A. Breen

Name • Nombre JACQUELINE & ALAN BREEN Email • Correo Electrónico: jbreen@triconet.org
Address • Domicilio 12250 W. CALLE MADERO
City • Ciudad TUCSON State • Estado AZ Zip • Código Postal: 85743

Contact • Contacte

MAIL: Interstate 11 Tier 1 EIS Study Team | c/o ADOT Communications | 1655 W. Jackson Street, Mail Drop 126F | Phoenix, AZ 85007

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingual) | PROJECT WEBSITE: i11study.com/Arizona

4-3-2019



Interstate 11 Corridor Tier 1 Environmental Impact Statement Nogales to Wickenburg

YOUR INPUT IS IMPORTANT • SU OPINIÓN ES IMPORTANTE

Please Print • Por favor, imprimir

General Comments • Comentarios Generales

Come on Arizona! Instead of being shmoozed by rich men with personal gains interests why dont you show a measure of pride and good conservatorship? We have unique flora and fauna not seen anywhere else in this world. We have a diversity of strong people with long familial ties to our land. Our local and state government HAS GOT TO WAKE UP and make preservation its forefront goal when considering any construction - especially in TUCSON!

We do not want to become another Phoenix! Moving interstate traffic away from our existing I-10 will have devastating effects on Tucson. We will lose business along the I-10 freeway as more people will consider a bypass route as being faster. The cost of building this bypass far exceeds any benefit Tucson will realize. But the alternative of improving I-10 for bypass benefits not only preserves our precious desert, it costs us FAR LESS than the I-11 proposal. To me, there is no argument that makes I-11 sense.

Name • Nombre Angela Besemer Email • Correo Electrónico: abcs85754@aol.com
Address • Domicilio P.O. Box 86154 } 12252 W. Calle Madero
TUCSON AZ 85743
City • Ciudad TUCSON } State • Estado AZ Zip • Código Postal: 85754

Contact • Contacto

MAIL: Interstate 11 Tier 1 EIS Study Team | c/o ADOT Communications | 1655 W. Jackson Street, Mail Drop 126F | Phoenix, AZ 85007

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingual) | PROJECT WEBSITE: i11study.com/Arizona



Jacqueline Breen
12250 W Calle Madero
Tucson, AZ 85743



PHOENIX AZ 952

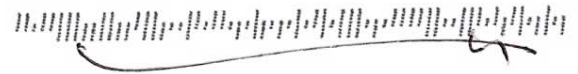
04 APR 2019 PM 4:1



ADOT. Interstate II, Tier I, EIS Study TEAM
c/o ADOT Communications
1655 W JACKSON STREET, MAIL DROP 126F
PHOENIX
AZ 85007

ATTN: JAY VAN ECHO

85007-327999



June 16,2019

I-11 Tier 1 EIS STUDY TEAM
c/o ADOT Communications
1655 W. Jackson St.
Mail Drop 126F
Phoenix, AZ 85007

RE: Comments for Proposed Alternative Route for Interstate 11

Dear Sirs:

We are adamantly against this proposed route. Our residence will be very adversely affected if not destroyed. The property value alone would be virtually destroyed.

The effect on quality of life for both humans and wildlife would be ruined be noise/light/gas and air pollution from trucks and other vehicles. The rural atmosphere will be destroyed by noise and lower air quality.

The wonderful atmosphere we love would also destroyed.

This will make it necessary for us to relocate if we can afford to, to a more pleasant location (away from the Tucson area).

Thank you for this opportunity to speak out.

Carl J. Brown/Constance Case
Residential Occupants

A handwritten signature in black ink, appearing to read 'C. Brown', with a large, stylized initial 'C'.

 Mr Carl J Brown
16201 W Feral Rd
Marana, AZ 85653-8290

PHOENIX AZ 852

17 JUN 2019 PM 5 L



I-11 Tier EIS Study Team
c/o ADOT Communications
1655 W. Jackson St.
Mail Drop 126F
Phoenix, AZ 85007

85007-327999



I-11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson Street
Mail Drop 126F
Phoenix, AZ 85007

May 7, 2019

I am a home owner in the Vista Royale subdivision. The current preferred I-11 interchange skirts our development, and actually intersects a part of someone's property. There doesn't seem to be a NEED for this part of the freeway to come this close to our subdivision. We are one of the only homeowner's subdivision in this area. There is plenty of land that is beyond our boundaries. The noise alone would be a big problem preventing our full enjoyment of being in the country, and also the air pollution will increase causing more allergies and sickness for our residents and our animals.

I am asking for you to move this freeway at least a mile from our property. At this stage of the planning please consider moving the route some greater distance from Vista Royale.

Thank you very much,

Susan Brown
21475 W Vista Royale Drive
Wickenburg, Az. 85390





Ms. Susan E. Brown
21475 W. Vista Royale Dr.
Wickenburg, AZ 85390

PHOENIX AZ 852

08 MAY 2019 PM 8 L

Brown, S
I-3231

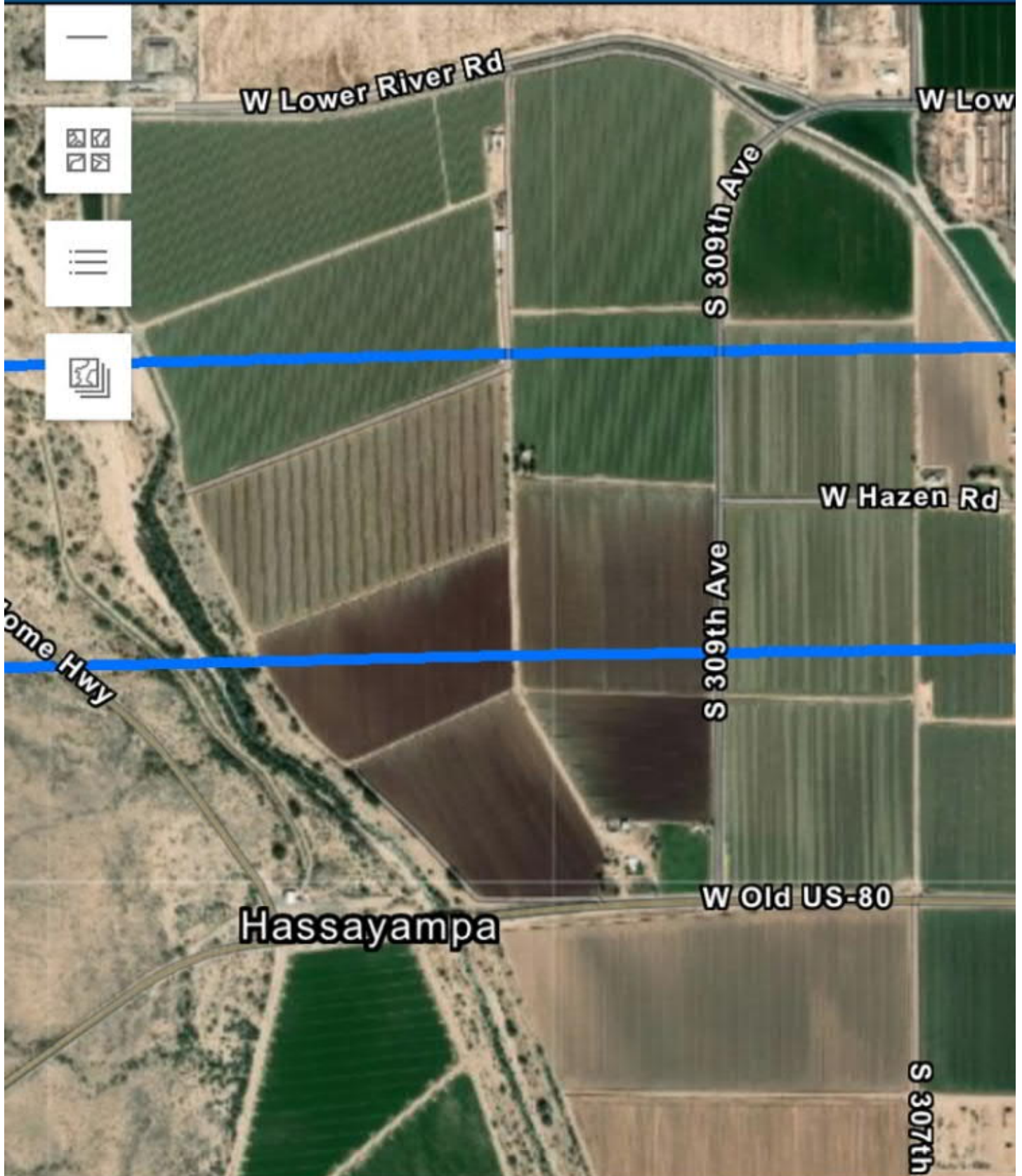


I-11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St.
Mail Drop 126F
Phoenix, Az 85007

85007-327998



I-11 Alternatives



June 24, 2019

M.A. Burgess

PO Box 87704

Tucson, AZ 85754

TO: I-11 Tier 1 EIS Study Team

c/o ADOT Communications

1655 W Jackson Street, Mail Drop 126F

Phoenix, AZ 85007

To ADOT Communications Staff and others Whom it May Concern:

I am writing to you in reasonable and vehement opposition to the so-called Recommended Alternative for Interstate 11 by-pass through rural Altar and Avra Valley. The nature of this desert valley cannot support or survive a freeway.

I have worked in Avra Valley and Altar Valley for over 50 years, with Native Tohono O'odham harvesters, with local farmers, native plant growers, scientists, with Buenos Aires National Wildlife Refuge, Ironwood Forest, Saguaro National Park West since it was a National Monument, and on staff at the Arizona-Sonora Desert Museum, hence I speak with wisdom and care, from a deep perspective.

The iconic desert plants of this wide valley system, and the rural, long-distance desert landscape of scattered farms and preserved natural areas, are part of our collective Arizona Heritage and should not be compromised.

The area's economic importance for tourism alone – left as rural landscape-- should ring loud cash-register bells in the mind of any planner or economist. Tourists come here to Saguaro National Park, to the world-famous Desert Museum, to the remote Ironwood Forest, positively enhancing Arizona's economy; visitors and residents alike are blown away by the true unbroken, long-range views, the experience and feeling of expansive desert landscape. If you would put a value on a broad unbroken vista, find a direct indication in Tucson's tourism dollars.

Since before statehood to the present, landowners have settled Avra Valley because it IS rural, because it does NOT have fast-moving traffic and vehicle noise and pollution. They deserve to have planners understand this and keep it rural.

Scientists continue long-term studies of Avra Valley's and Altar Valley's unique desert plants and animals. A freeway would harm the very habitat and corridors of their plant and animal subjects, interrupting natural movement. Their time-critical studies would be altered or destroyed. Astronomers

at Kitt Peak National Observatory depend on dark skies for their studies of deep space. A freeway with its necessary lighting systems, traffic, and increased population would compromise the present low light levels of the Valley that make astronomy at Kitt Peak so successful.

But far more important than economic benefit, rural lifestyle, popular recreation on public lands, or scientific value is the need to keep traditional Native American harvesting terrain intact. A freeway through the middle of traditional Tohono O'odham desert harvesting land is unethical, insupportable, racially discriminating, and socially and culturally destructive. The Valley must be left intact, undivided by the destructive slice of a freeway. The traditional Tohono O'odham still use this terrain not only for their ceremonial saguaro harvest, but also as a source of critical foods that they are using in increasing quantity for diabetes prevention—mesquite from mesquite woodlands, cholla, wild rhubarb, prickly pear cactus pads and fruits, wild chia, amaranth grain.... These wild-harvested, disease-preventing foods lie right in the path of the proposed freeway. Such traffic would not only prevent ingress and egress to harvest-land, it would pollute the foods themselves. The greater dual Valley area is a garden and pharmacy for Native Elders and an educational training ground for young Natives who are trying to stay healthy, physically and culturally.

Another route through an already-urbanized, already-disturbed space should be found for Interstate 11, such as the orange route shown on a recent map of alternatives. With advancing technology, the present corridor of I-10 and I-19 could be used far more efficiently with double deck or underground traffic.

Please—No more disturbance of our natural, precious, valuable desert! The swath cut by a freeway corridor invites every form of unhealthy pollution—dust, emissions, noise, noxious and invasive species.

Thank you for attending to these truths and for considering Nature, culture, and health in preserving what we have!

Sincerely,



Martha A Burgess

Ethnobotanist

520-907-9471, marthaab@aol.com



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

I hope an investigative reporter can find out who besides Don Diamonds 400 acre "holding" is waiting for I-11 to bring more people to buy luxury homes. (No big sign looking for the tired, the poor, etc. etc.) This poor choice will cost millions more than a simple addition of dedicated truck lanes cut away from cities and towns. We have the Gila Bend Bypass. That would work. We need light rail, fast passenger trains, and cut back on driving. Pollution, climate change, and health are on the line.

Contact Information (optional)

Name Barb Cain Email bindcain@msn.com
 Address 3489 N. Cmo. La Tijarra Ila
 City Tucson State AZ ZIP 85712

Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact Laura Douglas, ADOT Community Relations Project Manager, at 602.712.7683 or ldouglas@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

有关中文信息, 请致电 1-844-544-8049.

CONTACT

MAIL: I-11 Tier 1 EIS Study Team • c/o ADOT Communications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)5

i11study.com/Arizona



**Coalition for
Sonoran Desert Protection**

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 * sonorandesert.org

Arizona Center for Law in the Public Interest * Arizona Native Plant Society * Bat Conservation International * Cascabel Conservation Association * Center for Biological Diversity * Center for Environmental Ethics * Defenders of Wildlife * Desert Watch * Environmental Law Society * Friends of Cabeza Prieta * Friends of Ironwood Forest * Friends of Madera Canyon * Friends of Saguaro National Park * Friends of Tortolita * Gates Pass Area Neighborhood Association * Genius Loci Foundation * Native Seeds / SEARCH * Protect Land and Neighborhoods * Safford Peak Watershed Education Team * Save the Scenic Santa Ritas * Sierra Club – Grand Canyon Chapter * Sierra Club – Rincon Group * Sky Island Alliance * Society for Ecological Restoration * Southwestern Biological Institute * Tortolita Homeowners Association * Tucson Audubon Society * Tucson Herpetological Society * Tucson Mountains Association * Wildlands Network

July 4, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg*. We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection and the undersigned organizations.

Overview

In summary, we are in strong opposition to the Recommended Alternative route identified in the I-11 Tier 1 DEIS (“DEIS”). Our opposition is rooted in the major negative environmental and economic impacts that would inevitably occur if the Recommended Alternative route is successfully built and our belief that other transportation alternatives, including improving and expanding existing interstates, a focus on multi-modal solutions, and the inclusion of expanded rail service, could more effectively achieve the goals identified in the DEIS.

The Recommended Alternative route would have grave and devastating impacts to Pima County that cannot be adequately mitigated. These include:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation’s Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County’s Conservation Lands System.
- Impacts to planned mitigation lands for Pima County’s Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

- Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona's Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.
- Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water's CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- Impacts to Tucson's businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
- Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
- Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.

We believe that these impacts cannot be adequately mitigated.

Purpose and Need

First and foremost, we strongly believe that ADOT and FHWA have failed to clearly and thoroughly demonstrate the need for construction of an entirely new freeway, based on the best available science and data. ADOT and FHWA should analyze not only the most current transportation and growth models and current and projected traffic volumes, but also changing transportation modes. For example, if the Mariposa Point of Entry was fully staffed and operational 24 hours a day (which it currently is not), the currently required overnight parking would be reduced, spreading out traffic volumes throughout the day (and also decreasing air pollution since refrigerated trucks have to stay running all night long while they are parked), and negating the need for this proposal at all. Additionally, autonomous truck testing is currently occurring in southern Arizona, is expected to continue, and could safely accommodate truck traffic at night or in a designated lane. ¹

The following planned projects should be analyzed by ADOT and FHWA:

- Plans to continue widening Interstate 10.

¹ <https://www.wired.com/story/embark-self-driving-truck-deliveries/>
https://tucson.com/business/pcc-tusimple-team-up-to-offer-self-driving-truck-operations/article_fb05bf3e-ba44-5dfd-ab23-dd6975cd509a.html

<https://www.tucsonweekly.com/tucson/hands-off-the-wheel/Content?oid=25111164>

- Elements of ADOT's 2017-2021 Five Year Plan to include, but not be limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.
- ADOT's 2011 "State Rail Plan," which was developed to address the needs of both freight and passengers.²

Also, of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of \$54 million secured in a highway grant for ADOT's I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation's competitive FASTLANE program. Tucson Mayor Rothschild said, "Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that's very good news for Tucson, Phoenix and the state as a whole."³

Concerns with the overall NEPA process

We have serious concerns about the larger NEPA process and the premature identification of a "Recommended Alternative" route without adequate scientific and economic analysis and environmental studies. We question the ability of the involved agencies to present thorough information to the public about the myriad impacts of the Recommended Alternative route, and other considered alternatives, given the inadequate analysis presented in the DEIS. **We fully support and incorporate by reference the full comments on the I-11 DEIS submitted by the National Parks Conservation Association in July 2019, including a more detailed analysis on this issue.**

Major Environmental Impacts from the Recommended Alternative Route

Impacts to Federal and Local Protected Areas

The Recommended Alternative route would have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the significant biological and cultural resources they contain. The Recommended Alternative route would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County's federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan, which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and *mitigation lands in Avra Valley are critical to its long-term success with special emphasis on riparian areas*. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014, and this HCP is currently under

² See: <https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0>. This rail plan was based off of this study completed in 2010: <https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0>

³ See <http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

review. Meanwhile, Tucson Water's operations in Avra Valley are planned and conducted as if the HCP is already in full effect. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are as important to consider as federal conservation lands in Pima County. Unfortunately, impacts to local conservation lands have not been adequately addressed and analyzed in the documents related to this process, including the DEIS. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their federal Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are in Avra Valley and directly in the path of the Recommended Alternative route. It is disappointing to see a total lack of acknowledgement of these important local conservation lands in the DEIS and in recent public presentations and materials - any review of environmental impacts should address impacts to local conservation lands in detail, particularly in light of the fact that these protections are a result of a federal Incidental Take Permit.

Impacts to Wildlife Linkages

The Recommended Alternative route would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.⁴

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the

⁴ Arizona Wildlife Linkages Assessment: <https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>

Pima County Wildlife Connectivity Assessment:
http://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf

isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, wildlife genetic health, and overall ecosystem resilience in this area.

Impacts to local wildlife linkages are not adequately addressed in the DEIS and adequate mitigation for impacts resulting from the Recommended Alternative route are not possible.

Impacts to Pima County's Conservation Lands System

The Recommended Alternative route would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. **We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS are not adequately addressed in the DEIS. The Recommended Alternative route would damage CLS mitigation lands to such an extent that the integrity of Pima County's federal ITP permit would be compromised. Again, adequate mitigation for these impacts is not possible.⁵**

Impacts to Riparian Habitat

The Recommended Alternative route would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest

⁵ Pima County's Conservation Lands System Map and Policies:

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf

The full text of the MSCP, Annual Reports, maps, and other important information can be found at:
<http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=52674>

More information on Pima County's Sonoran Desert Conservation Plan can be found at:
http://webcms.pima.gov/government/sustainability_and_conservation/conservation_science/the_sonoran_desert_conservation_plan/

region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

“Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state.”⁶

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS’s IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

The lack of consideration of the certainty of flooding in the Altar and Avra Valleys and the subsequent isolation of people and properties from public health and safety responders, not to mention the potential costly relocation of existing infrastructure for the CAP canal, Tucson Water, Marana Water and other regional water providers, numerous El Paso/Kinder Morgan boosting stations, and various electric utility substations is just one example of the flawed NEPA process. This woeful lack of analysis of social, cultural, scientific and economic impacts in the choice of an alternative without adequate due diligence is negligent and should be considered a fatal flaw. This DEIS puts the cart before the horse and would have dire consequences for the region.

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally “endangered” or “threatened,” those identified by the state of Arizona HabiMap (www.habimap.org) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima

⁶ http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf

County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

Aberts towhee
Bell's vireo
Western burrowing owl
Cactus ferruginous pygmy-owl
Western yellow-billed cuckoo
Swainson's hawk
Rufous-winged sparrow
Giant spotted whiptail
Tucson shovel-nosed snake
Pima pineapple cactus
Nichol turk's head cactus
California leaf-nosed bat
Mexican long-tailed bat
Pale Townsend's big-eared bat
Lesser long-nosed bat
Merriam's mouse
Jaguar
Ocelot

Specific impacts to the Tucson shovel-nosed snake

The Tucson shovel-nosed snake (*Chionactis annulata klauberi*) is a small colubrid adapted to the sandy loams of the northeastern Sonoran Desert region of central and southeastern Arizona. It was petitioned for listing as “threatened” or “endangered” under the US Endangered Species Act (ESA) based on its habitat specialization in sandy desert flats subject to agricultural conversion and urban sprawl and its disappearance from the Tucson region (Center for Biological Diversity 2004). The subspecies was defined based on the strong infusion of black pigment on the red crossbands, which may enhance both coral snake mimicry and background-matching via flicker-fusion (Mahrdt et al. 2001). Its geographic range was described by Klauber (1951) and Cross (1979) and additional genetic analysis by Wood et al. (2008, 2014) supported continued recognition of the subspecies but did not define its distributional limits.⁷

⁷ Mahrdt, C.R.; Beaman, K.R.; Rosen P.C.; [et al]. 2001. *Chionactis occipitalis*. Catalog of American Amphibians and Reptiles. 731: 1–12.

Klauber, L.M. 1951. The shovel-nosed snake, *Chionactis* with descriptions of two new subspecies. Transactions of the San Diego Society of Natural History. 11: 141–204.

Cross, J.K. 1979. Multivariate and univariate character geography in *Chionactis* (Reptilia: Serpentes). Dissertation. Tucson, AZ: The University of Arizona. 517 p.
http://arizona.openrepository.com/arizona/bitstream/10150/298514/1/azu_td_7916875_sip1_m.pdf [accessed February 2, 2018].

In 2014 the U.S. Fish and Wildlife Service rejected the snake for ESA listing based on an incorrect range map for the subspecies that included geographic areas within a sister taxon, *C. a. annulata* (USFWS; 2014). In 2018, Bradley and Rosen (in press) produced a more accurate distribution model for the species based on published genetic and distributional data (Figure 1).⁸ They found that 39% of its habitat has been lost to urban development and agriculture and the remaining habitat is in geographically isolated pockets with no genetic connectivity to each other.

The I-11 Recommended Alternative route would have dire consequences for the remaining population of the Tucson shovel-nosed snake through road strikes and further habitat fragmentation. The highway would bisect some of the last intact habitat for the subspecies, including occupied territory within the Avra Valley. Another example of this is evident in the areas between Gila Bend and Maricopa, within and adjacent to the Sonoran Desert National Monument. This has been a reliable place to still see the snake and several individuals have been recorded along highway 238. The Recommended Alternative route would cut through this habitat block and this area would become a population sink as snakes and other wildlife, venturing outside of the monument, would be crushed by trucks and cars.

Further analysis of impacts to the Tucson shovel-nosed snake needs to be completed by the agencies to adequately understand the impacts of corridor alternatives.

Wood, D.A.; Meik, J.M.; Holycross, A.T.; [et al.]. 2008. Molecular and phenotypic diversity in the Western Shovel-nosed snake, with emphasis on the status of the Tucson Shovel-nosed snake (*Chionactis occipitalis klauberi*). *Conservation Genetics*. 9: 1489–1507.

Wood, D.A.; Fisher, R.N.; Vandergast, A.G. 2014. Fuzzy Boundaries: Color and Gene Flow Patterns among Parapatric Lineages of the Western Shovel-Nosed Snake and Taxonomic Implication. *PLoS ONE* 9(5): e97494.

⁸ U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office. 2014. Species Status Report for the Tucson Shovel-Nosed Snake. [Online]. 78 p. Available: <https://www.regulations.gov/document?D=FWS-R2-ES-2014-0035-0002>.

Bradley, C.M. and Rosen, P.R. In Press. Defining suitable habitat and Conservation Status for the Tucson shovel-nosed snake (*Chionactis annulata klauberi*) in the Sonoran Desert. Biodiversity and Management of the Madrean Archipelago IV conference proceedings.

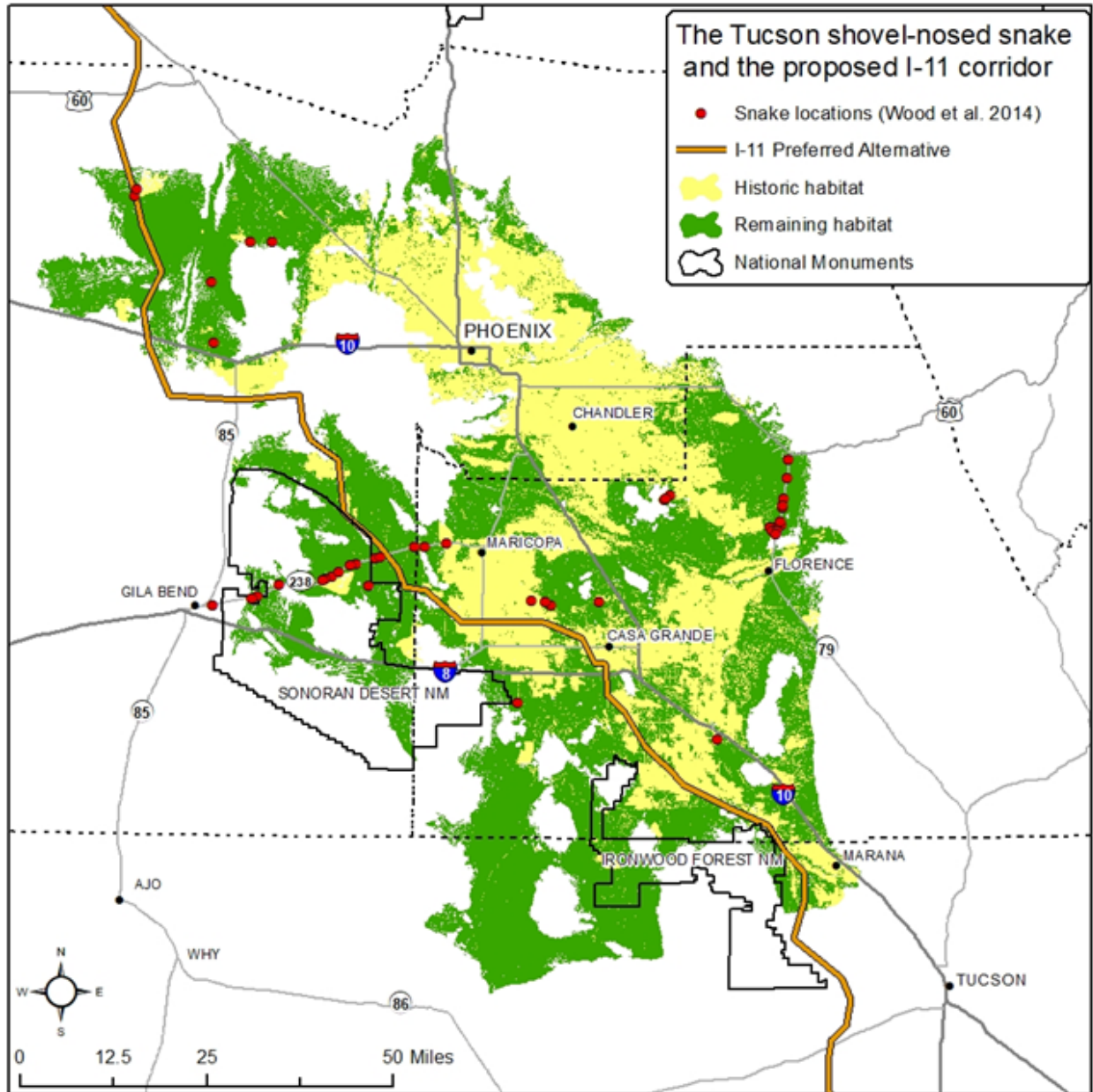


Figure 1: Historic and remaining habitat for the Tucson shovel-nosed snake and the I-11 Recommended Alternative route.

Impacts from noise and light pollution

The Recommended Alternative route would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they use through noise and light pollution. The Recommended Alternative route would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights, street lighting, and from reasonably foreseeable future commercial and residential development.

Impacts to the economy

The Recommended Alternative route runs adjacent to some of southern Arizona's long-standing economic powerhouses, such as the Arizona-Sonora Desert Museum, Saguaro National Park West, and Old Tucson. It also comes perilously close to emerging economic engines such as Ironwood Forest National Monument.

A May 28, 2019 press release directly from Saguaro National Park and the National Park Service stated that, "957,000 visitors to Saguaro National Park in 2018 spent \$62.1 million in communities near the park. That spending supported 866 jobs in the local area, \$31.3 million in labor income and had a cumulative benefit to the local economy of \$90.9 million dollars." The Recommended Alternative route is located within 1,300 feet of the boundary of Saguaro National Park and will have unmitigable impacts on the visitor experience, including increased noise, light, haze and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of viewsheds. None of these impacts can be adequately mitigated.

The Recommended Alternative route is also located within 400 feet of the boundary of Ironwood Forest National Monument, an increasingly popular national monument supported by a robust and active group of volunteers and land managers. A new visitor kiosk was recently installed at IFNM at the Agua Blanca portal and the annual "Meet the Monument" event grows every year, with increasing numbers of participants every year. Building a freeway next to these protected public lands would cause irreparable harm to a place that is gaining momentum and actively investing in the visitor experience.

On April 17, 2019, local newspaper the AZ Daily Star reported on a recent U.S. News and World Report article that identified the Arizona-Sonora Desert Museum as one of the best 30 zoos nationwide. The Recommended Alternative route is located within approximately a half-mile of the Arizona-Sonora Desert Museum. Construction of this route would cause increased noise, light, and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of the viewshed at the museum. None of these impacts can be adequately mitigated.

The Recommended Alternative route would also drive traffic AWAY from Tucson's downtown and growing business districts that rely on traffic from I-19 and I-10 to survive. The City of Tucson resolution adopted unanimously by the Mayor and Council on June 19, 2019 clearly states opposition to the Recommended Alternative route and includes the following statements:

"...Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods.

...Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination.

...In April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district.

...Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics.

...Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations.

...[The] cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson.

...[The] state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions - by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic."

These are all economic arguments for either the No Build alternative or co-locating I-11 with I-19 and I-10 and demonstrate the grave economic consequences to the City of Tucson from the Recommended Alternative route. It is impossible to mitigate for these impacts to Tucson's economy and water supply.

Last, the DEIS needs to improve its analysis of the far-reaching impacts to local governments from building a brand-new freeway in a currently rural area. The Recommended Alternative route would lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other infrastructure and services, the cost of which would likely be borne by local governments such as the City of Tucson, Town of Marana, and Pima County.

Cost of considered alternatives

Our interpretation of the cost of considered alternatives in the DEIS indicates that the Recommended Alternative route would cost approximately \$3.4 billion MORE to construct than the Orange Alternative that co-locates I-11 with I-19 and I-10 in the Tucson region. This estimate is based on information in Table 2-8 on page 2-33 of the DEIS. For Section A-F2, the Green Build Alternative construction costs are estimated to be \$3,998,431,000 and the Orange Build Alternative construction costs are estimated to be \$585,899,000. This leads to the conclusion that it will cost approximately \$3.4 billion more to construct the Green Build Alternative. **We are also unclear why the DEIS does not clearly outline the costs of the Recommended Alternative route (blue on maps), rather leaving it up to the reader to somehow interpret the costs from the other identified routes and where they overlap with**

the Recommended Alternative route. The public should be given clear information for comparison and not be left to make unsure inferences from the incomplete data presented.

One other example of where the DEIS states the costs of considered alternatives in a confusing and incomplete way is in the following section:

Errata 4.5.3

Tunneling – Placing portions of the proposed Project in a tunnel was considered in the property-specific avoidance analysis (Section 4.4.3) as a means to avoid potential impacts to clusters of properties and Historic Districts. FHWA determined that tunneling could result in a use of one or more Section 4(f) properties and, therefore, is not an avoidance alternative. However, even if a way of avoiding use of Section 4(f) properties were to be found, the cost estimate for placing I-11 in a tunnel in Downtown Tucson is approximately \$3.5 to \$5.1 billion, compared to \$240 million for the at-grade concept and \$1 billion for the elevated concept. The extraordinary cost for tunneling indicates that, while tunneling may be feasible, it is not prudent (Avoidance Analysis Factor 4).
Elevated Structures – Elevating I-11 in Downtown Tucson to avoid impacting Section 4(f) properties was considered in the property-specific avoidance analysis (Section 4.4.3.2 and 4.4.3.3). Although the elevated lanes could avoid direct impacts on adjacent Section 4(f) properties, noise and visual impacts would result in adverse effects to historic buildings and structures. Deep excavations for the elevated structure foundations would impact archaeological resources. For these reasons, an elevated lanes alternative through Downtown Tucson is not an avoidance alternative. The elevated alternative also would impact businesses and residences that are not protected by Section 4(f) and would add \$1 billion to the overall capital cost of the Orange Alternative.

It is unclear what specifically the “\$240 million” is referring to in terms of the specific section of highway considered for an at-grade concept. It should also be noted that even though \$1 billion was added to the Orange Alternative in order to elevate I-11 through downtown Tucson, the capital costs would still be \$2.4 billion LESS than the Recommended Alternative route.

In general, we are disappointed with the presentation of the cost of considered alternatives - they are difficult to interpret and should be more clearly and conclusively discussed so compared costs of alternatives are clear to the reader. The examples highlighted above are not exhaustive by any means and we recommend a thorough overhauling of this entire section of the DEIS.

Inadequate 4(F) analysis

The comparison between impacts to the Tucson Mitigation Corridor (TMC) and impacts to the seven historic properties likely to be used if the Orange Alternative is chosen are inadequate as presented in the DEIS.

Use of programmatic “net benefit” evaluation for TMC is inappropriate

Conducting a “net benefit” programmatic evaluation of the proposed use of the TMC is completely inappropriate for this 4(f) property. First, the federal regulations that govern 4(f)

evaluations make clear that the use of programmatic evaluations like the “net benefit” evaluation are to be used only “for certain minor uses of Section 4(f) property.” (23 CFR 774.3(d)) Additionally, per agency guidance, the “net benefit” must be realized on the 4(f) property itself; promising off-site mitigation to offset impacts to a 4(f) property is not the same thing. According to FHWA guidance, a “‘net benefit’ is achieved when the transportation use, the measures to minimize harm, and the mitigation incorporated into the project results in an overall enhancement of the Section 4(f) property... A project does not achieve a “net benefit” if it will result in a substantial diminishment of the function or value that made the property eligible for Section 4(f) protection.”⁹

There is simply no way to achieve a “net benefit” on this 4(f) property, as the use proposed here will, without a doubt, diminish - if not entirely undermine - the ability of the TMC to provide landscape connectivity for wildlife movement. This is especially true considering that this property is itself serving as mitigation for a previous linear project that impacted landscape connectivity in this same area. Regardless of the off-site mitigation promised, it is unlikely that this property will be able to continue to serve as mitigation for that previous project, should this proposed use be approved. **For these reasons, the use of the “net benefit” evaluation for the TMC is simply indefensible. The agencies should conduct an individual evaluation on the TMC property and revise the entire *Draft Preliminary Section 4(f) Evaluation* to consider that individual evaluation.**

Assessment of 4(f) property uses relies on inconsistent information

Because the agencies relied on the incorrect assumption that a “net benefit” would be achieved for the TMC 4(f) property, the DEIS provides no information whatsoever on the actual impacts that may be inflicted on the TMC. No baseline information on the TMC is provided and no information on potential impacts is provided. Without this information, there is no way for the reader to understand what a “net benefit” even means in this context; thus, it is inappropriate to leave this information out. However, because net benefit is inappropriate, it is imperative that the EIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

For example, Google imagery does not provide adequate information for assessing historic integrity and architectural significance for numerous reasons, and there are other far more valid approaches to evaluating such properties that the agencies could have used instead. Acknowledging one of the many pitfalls of this approach, the DEIS admits that “many [properties] were classified as possibly eligible simply because the Google imagery did not provide a clear view.”

In addition, the DEIS is inconsistent in analyzing the costs and feasibility of tunneling through downtown Tucson but does not include a similar analysis of the costs and feasibility of tunneling under the entire 4(f) Tucson Mitigation Corridor.

⁹ “Section 4(f) Evaluation and Approval for Transportation Projects that Have a Net Benefit to a Section 4(f) Property.” Federal Highway Administration Environmental Review Toolkit.
https://www.environment.fhwa.dot.gov/legislation/section4f/4f_netbenefits.aspx.

The DEIS is inconsistent in how it presents information related to the assessment of 4(f) properties. One example of this can be found in a comparison of how information regarding the TMC is represented versus how information regarding the downtown Tucson historic properties is represented. While it is technically true that 15% of the TMC acreage would be within the build corridor (453 out of 2958 acres), far more than just 15% would actually be impacted, considering the purpose for which the TMC was designated (providing landscape connectivity for wildlife movement). In contrast, the EIS asserts that 100% (3 of 3 acres) of the Manning House would be “used;” however, the document goes on to say, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” (EIS at 3.7-24.) Therefore, while 100% of this historic property would be within the corridor, the EIS makes clear that the impact is not 100%. However, with the TMC no parallel consideration of actual impacts is given.

Reliance on insufficient information to compare each Alternative’s potential use of 4(f) properties.

Agencies are required to “identify any methodologies used and shall make explicit reference... to the scientific and other sources relied upon for conclusions in the statement.” (40 CFR 1502.24.) It has long been established that agencies must articulate “a rational connection between the facts found and the choice made.” *Motor Vehicle Mfrs. Ass’n of the U.S. v. State Farm Mut. Auto Ins. Co.*, 463 U.S. 29, 43 (1983).

The flaws resulting from the “net benefit” assumption for TMC aside, the validity of some of the information used to inform the comparison of 4(f) properties is extremely questionable. The information provided for each property is insufficient, in some cases contradictory, and is undermined by inadequate, contradictory information about the properties being compared, and using different metrics.

Scope and Intensity of Impacts to 4(f) properties potentially impacted by Orange Alternative are artificially inflated, while no corollary information is provided for the 4(f) property potentially impacted by the Purple and Green Alternatives.

The DEIS’s comparison of the number of 4(f) properties and their potential use under each alternative is confounding to the reader, precluding meaningful analysis.

Table 4-4 provides the percentage of each 4(f) property located within a build corridor for the various alternatives. However, this information seems to contradict information in the text, causing confusion regarding how potential use of each property is being assessed. This results in a significantly problematic apples-to-oranges comparison of the potential use of each property that tells the reader virtually nothing about the actual potential use of each 4(f) property.

For example, the potential use of the Manning House in downtown Tucson is unclear. First, the property description is inconsistent from one section to the next; on table 4-4 it is described as 1 acre in size, but on table 4-4 it is described as 3 acres in size. Second, Table 4-4 estimates that 100% of the property is subject to “potential use,” but in the text on page 3.7-24 the DEIS

states, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” This indicates that the percentage of “potential use” is not the same as the percentage of the property potentially directly impacted, indicating that indirect impacts are part of the “potential use” consideration. Another example of this is Barrio Anita, where the percentage of the property subject to “potential use” is 85 percent. At the same time, the text states that out of 66 buildings identified in the Barrio Anita Historic District NRHP nomination, the Orange Alternative “could require land from four parcels with contributing residences along the west side of Contzen Avenue but not all of those houses might be directly affected” (EIS at 3.7-24). To make matters more confusing, elsewhere the text states, “The Orange Alternative could require... Removal of at least one historic residential structure adjacent to I-10 in Barrio Anita” (page 4-75). Again, the only explanation for the discrepancy between the percentage of potential use and the amount of land potentially directly impacted is that indirect impacts are considered in the percentage of potential use.

In contrast, the potential use of the TMC property does not appear to include indirect impacts. Table 4-4 shows that only 15% of the property is subject to potential use, with only the percentage of land directly impacted. However, the percentage of potential use would be far larger if indirect impacts are considered for this property, considering how severely compromised the TMC would be as a wildlife movement corridor if an interstate is routed along its entire western boundary or diagonally, from southeast to northwest, through the parcel. There is no explanation for why the TMC is not given the same consideration as the 4(f) properties it is being compared against.

Other discrepancies abound. Page 4-73 provides a list of seven 4(f) properties in downtown Tucson that are subject to potential use by the Orange Alternative, which includes the Barrio Anita Historic District and the David G. Herrera and Ramon Quiroz Park (formerly Oury Park). The analysis uses this number to compare the Orange Alternative’s potential impacts to 4(f) properties to those of the Purple and Green Alternatives, where only one property -- the TMC -- is subject to potential use. However, the text makes clear that Quiroz Park is a contributing property to the Barrio Anita Historic District, and the Park is not listed separately on Table 4-2 or Table 4-4. Inadvertently or otherwise, listing Quiroz Park separately only in this context artificially increases the number of properties potentially impacted by the Orange Alternative and skews the comparison with the Purple and Green Alternatives.

Information provided in Least Harm Analysis is so inadequate it precludes meaningful analysis

Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property

When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, “There is a low ability to mitigate the impacts of the Orange Alternative.”

In addition, on page 4-108 the DEIS states, “After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable...” Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation.

On page 4-96, the DEIS states, “As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property.” This statement explicitly demonstrates skewing of the comparison.

Least harm analysis Factor 3: Relative significance of each Section 4(f) property

The DEIS asserts the following on page 4-97, “FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value.” We strongly disagree with this outlandish statement and urge further evaluation of all Section 4(f) properties. This statement asserts that the entire Tucson Mitigation Corridor is equal to the parking lot of the Manning House, which is a ridiculous and erroneous assertion to make.

Least harm analysis Factor 6

Section 4(f) properties are defined in part as “*publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site).*” The Ironwood Forest National Monument was designated by Presidential Proclamation in June of 2000, under a new protective classification of federal Bureau of Land Management lands. We disagree with the conclusion in the DEIS (Appendix F) that fails to recognize Ironwood Forest National Monument as a Section 4(f) property.

Furthermore, the DEIS fails to consider the magnitude of adverse impacts on multiple properties not protected by Section 4(f). For example, for the Purple and Green Alternatives, this analysis must include the Ironwood Forest National Monument (see above), Tucson Mountain Wildlife Area, and Sonoran Desert National Monument. We believe these properties should be considered as 4(f) properties. However, even though these properties are not considered 4(f) properties, this does not mean there are no adverse impacts to them.

Consideration of other transportation strategies

The DEIS and the choice of the Recommended Alternative route overlooks other less costly options that would encourage the free flow of goods through our region. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;

- Technologies that improve traffic flows;
- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

During the Scoping phase, we strongly recommended a more thorough analysis and consideration of these other transportation strategies that will also better equip our region to adapt to the growing impacts of climate change. Assessing the cumulative impacts of these options on congestion also needs to be more thoroughly considered in the DEIS. **We reiterate our request for this more thorough analysis in future planning efforts and this analysis be completed and shared with the public prior to designating a Preferred Alternative.**

Additional necessary studies

The following studies must be completed prior to designating a Preferred Alternative, with the results communicated to the community and incorporated into the decision process early on:

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the Recommended Alternative route. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Brawley/Los Robles wash system and Santa Cruz River.
- Social and economic equity impacts.

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any Recommended Alternative route. Furthermore, we strongly encourage ADOT and FHWA to refer to the “I-11 Super Corridor Study” final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and the University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Using such studies and designs would help us reduce impacts in Tucson's downtown and surrounding areas should co-location be further considered.

Other factors that must be more thoroughly analyzed for all corridor alternatives include how continued climate change, which is a reasonably foreseeable circumstance, will impact Arizona's water resources and projected population growth; public health implications,

including increased air pollution and the proliferation of valley fever; and long-term impacts on local and regional land-use plans.

The Recommended Alternative route through Avra Valley would facilitate commercial and residential development in this area. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.

Considering the identified Recommended Alternative route in the DEIS, we argue that either the No Build alternative or improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental and larger community impacts. **Because of this, we stand in strong opposition to the Recommended Alternative route.**

Local government opposition

In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 (attached) opposing “the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.” Additionally, the Board called for the expansion of “capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.”

Additionally, in April 2019 Pima County Board of Supervisors’ Chair Richard Elías and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, “The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through ‘invaluable Sonoran Desert areas.’ That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it” (attached). We strongly concur with Pima County’s elected officials and their resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, “The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction

of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately mitigated and that are contrary to the interstate design standards and criteria that must be applied to the project.”

On May 18, 2019, Arizona District 3 Congressman Raúl Grijalva submitted comments on the DEIS voicing his opposition to the Recommended Alternative route. We have attached the Congressman’s letter as well.

Thank you for the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. **Given the far-reaching and devastating impacts that the Recommended Alternative route would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, we express our strong opposition to the Recommended Alternative route and feel that should additional capacity be warranted, that reconfiguration of existing highways is the only acceptable Alternative. This DEIS is replete with inadequate analyses and is, in and of itself, a fatal flaw.** We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jodi Netzer, Director
Tucson Entrepreneurs

Robin Clark *for*
Avra Valley Coalition

Tom Hannagan, President
Friends of Ironwood Forest

Louise Misztal, Executive Director
Sky Island Alliance

Barbara Rose, Project Coordinator
Safford Peak Watershed Education Team

Diana Hadley, Co-President
Northern Jaguar Project

Demion Clinco, President
Tucson Historic Preservation Foundation

Sandy Bahr, Chapter Director
Sierra Club - Grand Canyon Chapter

Meg Weesner, Chair
Sierra Club - Rincon Group

Emily Yetman, Executive Director
Living Streets Alliance

Kevin Gaither-Banchoff, Development
Director
WildEarth Guardians

Peter Chesson, President
Tucson Mountains Association

Gayle Hartmann, President
Save the Scenic Santa Ritas

Robert Villa, President
Tucson Herpetological Society

Terry Majewski, Chair
Tucson-Pima Historical Commission

Ivy Schwartz, President
Community Water Coalition of Southern
Arizona

Jonathan Lutz, Executive Director
Tucson Audubon Society

Nancy Williams, President
People for Land and Neighborhoods

Fred Stula, Executive Director
Friends of Saguaro National Park

Pearl Mast and Anna Lands, Co-Chairs
Conservation Committee
Cascabel Conservation Association

Randy Serraglio, Southwest Conservation
Advocate
Center for Biological Diversity

Myles Traphagen, Borderlands Project
Coordinator
Wildlands Network

Gary Kordosky, President
Gates Pass Area Neighborhood Association

Della Grove, President
Citizens for Picture Rocks

Jessica Moreno, President
Arizona Chapter of The Wildlife Society

Mike Quigley, Arizona State Director
The Wilderness Society

Robert Peters, Southwest Representative
Defenders of Wildlife

Attachments: April 2019 Memo from Pima County Supervisors Richard Elías and Sharon
Bronson
Pima County Resolution No. 2007-343
City of Tucson Resolution No. 23051
May 2019 Letter from Rep. Raúl Grijalva (D-AZ)

ATTACHMENTS

April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson



PIMA COUNTY BOARD OF SUPERVISORS

130 WEST CONGRESS STREET, 11th FLOOR
TUCSON, ARIZONA 85701-1317

(520) 724-8126
district5@pima.gov
www.district5.pima.gov

To Whom it May Concern:

The Pima County Board of Supervisors adopted Resolution No. 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through "invaluable Sonoran Desert areas." That remains the official position of Pima County government.

At the time, the proposal under consideration was for an Interstate 10 Bypass Freeway, but it was along the same suggested routes as the currently proposed Interstate 11. A "favored" route then, as now, was through Avra Valley.

A freeway through the Avra Valley or other parts of the delicate Sonoran Desert is not compatible with the county's landmark Sonoran Desert Conservation Plan or with its Sustainability Plan to combat climate change in line with the 2015 Paris Agreement.

A freeway would destroy sensitive habitat for many of the 44 unique species of concern that the Conservation Plan protects. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn.

The Sustainability Plan aims to steer the county government operations away from fossil fuel use and dependency, and a new freeway would promote increased fossil-fuel use, to the detriment of our air quality as well as to climate change.

A freeway through Avra Valley would impact severely and negatively such jewels and tourist areas as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Arizona-Sonora Desert Museum. It would diminish vastly the quality of life of thousands of Avra Valley residents.

The cost of buying land for and building an entirely new freeway would be tremendous, when we do not have enough funds to maintain properly our existing roads and highways. It would cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

An Interstate 11 would divert traffic away from existing businesses that depend on Interstate 10 and Interstate 19 traffic visibility for their survival.

A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it.

Sincerely,

Richard Elías, Chairman
Pima County Board of Supervisors

Sharon Bronson, District Three Supervisor
Pima County Board of Supervisors

RESOLUTION NO. 2007- 343

**A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS IN
OPPOSITION TO CONSTRUCTION OF AN INTERSTATE HIGHWAY LINK
THAT BYPASSES TUCSON AND TRAVERSES PRISTINE AND INVALUABLE
SONORAN DESERT AREAS**

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

WHEREAS, Pima County has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel to this effort because of their greenhouse-gas and pollutant emissions, and therefore calls for the County to shift its fleet to use alternative fuels; and

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new controlled-access highway would be enormous, requiring the acquisition of thousands of acres of new rights of way, expenditures on high and rapidly increasing costs of concrete and asphalt, putting a tremendous burden on taxpayers and future highway users; and

WHEREAS, the production of the millions of tons of concrete and asphalt for this massive construction project would cause significant air pollution and greenhouse gas emissions, as would the operation of heavy machinery in the construction process; and

WHEREAS, a new controlled-access highway near or through Pima County on any route, would promote urban sprawl, causing local governments to incur large financial responsibilities for new infrastructure costs and force major changes to existing county land-use and zoning designations; and

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; and

WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.


2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.


Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:


Clerk of the Board
Deputy County Attorney

ADOPTED BY THE
MAYOR AND COUNCIL

June 18, 2019

RESOLUTION NO. 23051

RELATING TO PUBLIC HEALTH AND SAFETY: DECLARING MAYOR AND COUNCIL'S OPPOSITION TO CONSTRUCTION OF A NEW INTERSTATE HIGHWAY THAT BYPASSES THE CITY OF TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS; AND DECLARING AN EMERGENCY.

WHEREAS, the City of Tucson (Tucson) works to advance goals of sustainability, equity, economic growth and vibrant, livable neighborhoods; and

WHEREAS, in November 2013 Tucson voters adopted Plan Tucson, the City of Tucson General Plan & Sustainability Plan; and

WHEREAS, Tucson has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel because of their greenhouse-gas and pollutant emissions; and

WHEREAS, Plan Tucson seeks to create, preserve, and manage biologically rich, connected open space; wildlife and plant habitat; and wildlife corridors, including natural washes and pockets of native vegetation, while working to eradicate invasive species; and

WHEREAS, an interstate highway in the Avra Valley would degrade the Sonoran Desert, sever wildlife corridors, impede washes and flood prone areas, open new areas to intense residential and commercial development

far from existing urban centers, and encourage more car and truck travel at time when climate change and air pollution are growing concerns; and

WHEREAS, Tucson strives to protect night skies from light; and

WHEREAS, Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods; and

WHEREAS, Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination; and

WHEREAS, in April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district; and

WHEREAS, Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics; and

WHEREAS, Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations; and

WHEREAS, the Interstate 11 Draft Tier 1 Environmental Impact Statement Recommended Alternative route would run through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park - West, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona

Project mitigation parcel, and severing linkages between important habitat areas and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson; and

WHEREAS the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions – by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately

mitigated and that are contrary to the interstate design standards and criteria that must be applied to this project.

SECTION 2. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City of Tucson that this Resolution become immediately effective, an emergency is hereby declared to exist and this Resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Tucson, Arizona, June 18, 2019.

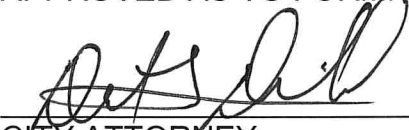
MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM:

REVIEWED BY:



JCP CITY ATTORNEY

CITY MANAGER

MR/dg
6/13/19

COMMITTEE ON NATURAL RESOURCES
CHAIRMAN

COMMITTEE ON EDUCATION AND LABOR
HIGHER EDUCATION AND WORKFORCE INVESTMENT
SUBCOMMITTEE

CIVIL RIGHTS AND HUMAN SERVICES SUBCOMMITTEE

CONGRESSIONAL PROGRESSIVE CAUCUS
CHAIR EMERITUS

Congress of the United States
House of Representatives
Washington, DC 20515-0307

WEBSITE: <http://grijalva.house.gov/>

May 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

Also emailed to: I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Dear Mr. Van Echo,

I would like to take this opportunity to provide input during the public comment period on the Draft Tier 1 EIS referenced above.

I am concerned that the current comment period is too short for a comprehensive review of this extremely large document (762 pages plus appendices). I request that the comment period be extended for a total of 120 days—which is common for projects of this magnitude and controversy—making the revised due date for comments August 3, 2019.

I support efforts to physically connect Arizona and Nevada via transportation corridors to facilitate Canadian and Mexican trade routes. The City of Tucson and the metro region of Pima County would benefit most by enhancing existing infrastructure that already provides the connection: Interstate 10 and 19, or option “A” and “B” that have been included in your route studies.

I am **very concerned** that a hybrid option of routes going through Altar and Avra Valley has instead been chosen for the preferred alternative in the Draft Tier 1 EIS. This route would necessitate building new interstate. This route would negatively impact rural communities in Avra Valley, Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and other protected open spaces and wildlife corridors. I pointed this out during the scoping process in a June 1, 2017, letter to project manager Jan Van Echo. For the record I would like to repeat my concerns:

This proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values, and quality of life for residents of that community. Even a limited access roadway would still open this mainly undeveloped area to massive sprawl. Residents of my district affected by this option have called my office expressing these same concerns. Pima County voters have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, the Federal Highway Administration and the Arizona Department of Transportation must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concerns expressed

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all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

One explanation for this conclusion is that a Tier 1 analysis is not enough for a federal process to come up with the better route alternative. The tiering of the required environmental compliance means that the decision is not informed by the best information and that vague promises of future mitigation is enough to allow the incredible decision to bisect an important wildlife mitigation area with a major freeway. This calls into question the Department of Transportation's unusual practice of coming to a decision without the full environmental compliance that most other federal projects regularly require.

A proposed MOU giving the state environmental compliance responsibilities for federal highway projects in Arizona, which would include the Tier 2 study, further demonstrates the inappropriate fragmentation of planning and compliance this project will receive, especially compared to projects with this sort of impact on protected lands that our community would normally expect.

Another issue of concern is the regularity with which this route keeps re-surfacing. Voters overwhelmingly voted against a ½ cent sales tax that would have funded a similar project back in the mid-1980s. The Picture Rocks community along with many other Pima Country residents and organizations have and continue to vocally oppose it, yet this route keeps being promoted as the preferred option.

Very little is being done to address alternatives to continuous freeway expansion, such as facilitating the expansion and use of intermodal shipping yards, facilitating the creation of public rail transportation lines as alternatives to continuously promoting freeway development—especially in pristine habitat corridor areas. I consistently remain opposed to any highway plan that opens up the Avra valley to widespread environmental destruction.

The possible fast tracking of this project, despite information typically disseminated by the project's managers at public meetings that there is not current funding available, is concerning. While that may be currently true, this project is in conjunction with the Federal Highway Administration, I-11 and Intermountain West Corridor Study (IWCS) completed in 2014. With talk in Congress about developing an infrastructure spending package, the state appears to be attempting to remove all barriers to fast tracking this project once, and if, funding is available. If Congress is able to pass an infrastructure package, the voters will have no say, as planning will be completed, and routes will have been previously selected.

If the project's purpose is to provide a high-priority north to south transportation corridor to connect to major metropolitan areas and markets with Mexico and Canada, then I believe that the best option is using Interstate 10 and 19, which already includes metropolitan Tucson and protects the environmentally sensitive area west of Tucson.

Thank you for your time and the opportunity to provide input.

Sincerely,



Raúl M. Grijalva,
Member of Congress, (AZ-03)

Cc: Jan Van Echo, PE, ADOT I-11 Study Manager



**Coalition for
Sonoran Desert Protection**

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 * sonorandesert.org

Arizona Center for Law in the Public Interest * Arizona Native Plant Society * Bat Conservation International * Cascabel Conservation Association * Center for Biological Diversity * Center for Environmental Ethics * Defenders of Wildlife * Desert Watch * Environmental Law Society * Friends of Cabeza Prieta * Friends of Ironwood Forest * Friends of Madera Canyon * Friends of Saguaro National Park * Friends of Tortolita * Gates Pass Area Neighborhood Association * Genius Loci Foundation * Native Seeds / SEARCH * Protect Land and Neighborhoods * Safford Peak Watershed Education Team * Save the Scenic Santa Ritas * Sierra Club – Grand Canyon Chapter * Sierra Club – Rincon Group * Sky Island Alliance * Society for Ecological Restoration * Southwestern Biological Institute * Tortolita Homeowners Association * Tucson Audubon Society * Tucson Herpetological Society * Tucson Mountains Association * Wildlands Network

July 4, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg*. We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection and the undersigned organizations.

Overview

In summary, we are in strong opposition to the Recommended Alternative route identified in the I-11 Tier 1 DEIS (“DEIS”). Our opposition is rooted in the major negative environmental and economic impacts that would inevitably occur if the Recommended Alternative route is successfully built and our belief that other transportation alternatives, including improving and expanding existing interstates, a focus on multi-modal solutions, and the inclusion of expanded rail service, could more effectively achieve the goals identified in the DEIS.

The Recommended Alternative route would have grave and devastating impacts to Pima County that cannot be adequately mitigated. These include:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation’s Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County’s Conservation Lands System.
- Impacts to planned mitigation lands for Pima County’s Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

- Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona's Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.
- Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water's CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- Impacts to Tucson's businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
- Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
- Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.

We believe that these impacts cannot be adequately mitigated.

Purpose and Need

First and foremost, we strongly believe that ADOT and FHWA have failed to clearly and thoroughly demonstrate the need for construction of an entirely new freeway, based on the best available science and data. ADOT and FHWA should analyze not only the most current transportation and growth models and current and projected traffic volumes, but also changing transportation modes. For example, if the Mariposa Point of Entry was fully staffed and operational 24 hours a day (which it currently is not), the currently required overnight parking would be reduced, spreading out traffic volumes throughout the day (and also decreasing air pollution since refrigerated trucks have to stay running all night long while they are parked), and negating the need for this proposal at all. Additionally, autonomous truck testing is currently occurring in southern Arizona, is expected to continue, and could safely accommodate truck traffic at night or in a designated lane.¹

The following planned projects should be analyzed by ADOT and FHWA:

- Plans to continue widening Interstate 10.

¹ <https://www.wired.com/story/embark-self-driving-truck-deliveries/>
https://tucson.com/business/pcc-tusimple-team-up-to-offer-self-driving-truck-operations/article_fb05bf3e-ba44-5dfd-ab23-dd6975cd509a.html

- Elements of ADOT's 2017-2021 Five Year Plan to include, but not be limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.
- ADOT's 2011 "State Rail Plan," which was developed to address the needs of both freight and passengers.²

Also, of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of \$54 million secured in a highway grant for ADOT's I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation's competitive FASTLANE program. Tucson Mayor Rothschild said, "Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that's very good news for Tucson, Phoenix and the state as a whole."³

Concerns with the overall NEPA process

We have serious concerns about the larger NEPA process and the premature identification of a "Recommended Alternative" route without adequate scientific and economic analysis and environmental studies. We question the ability of the involved agencies to present thorough information to the public about the myriad impacts of the Recommended Alternative route, and other considered alternatives, given the inadequate analysis presented in the DEIS. **We fully support and incorporate by reference the full comments on the I-11 DEIS submitted by the National Parks Conservation Association in July 2019, including a more detailed analysis on this issue.**

Major Environmental Impacts from the Recommended Alternative Route

Impacts to Federal and Local Protected Areas

The Recommended Alternative route would have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the significant biological and cultural resources they contain. The Recommended Alternative route would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County's federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan, which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and *mitigation lands in Avra Valley are critical to its long-term success with special emphasis on riparian areas*. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014, and this HCP is currently under

² See: <https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0>. This rail plan was based off of this study completed in 2010: <https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0>

³ See <http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

review. Meanwhile, Tucson Water's operations in Avra Valley are planned and conducted as if the HCP is already in full effect. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are as important to consider as federal conservation lands in Pima County. Unfortunately, impacts to local conservation lands have not been adequately addressed and analyzed in the documents related to this process, including the DEIS. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their federal Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are in Avra Valley and directly in the path of the Recommended Alternative route. It is disappointing to see a total lack of acknowledgement of these important local conservation lands in the DEIS and in recent public presentations and materials - any review of environmental impacts should address impacts to local conservation lands in detail, particularly in light of the fact that these protections are a result of a federal Incidental Take Permit.

Impacts to Wildlife Linkages

The Recommended Alternative route would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.⁴

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the

⁴ Arizona Wildlife Linkages Assessment: <https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>

isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, wildlife genetic health, and overall ecosystem resilience in this area.

Impacts to local wildlife linkages are not adequately addressed in the DEIS and adequate mitigation for impacts resulting from the Recommended Alternative route are not possible.

Impacts to Pima County's Conservation Lands System

The Recommended Alternative route would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. **We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS are not adequately addressed in the DEIS. The Recommended Alternative route would damage CLS mitigation lands to such an extent that the integrity of Pima County's federal ITP permit would be compromised. Again, adequate mitigation for these impacts is not possible.⁵**

Impacts to Riparian Habitat

The Recommended Alternative route would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest

⁵ Pima County's Conservation Lands System Map and Policies:

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf

The full text of the MSCP, Annual Reports, maps, and other important information can be found at:
<http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=52674>

More information on Pima County's Sonoran Desert Conservation Plan can be found at:
http://webcms.pima.gov/government/sustainability_and_conservation/conservation_science/the_sonoran_desert_conservation_plan/

region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

“Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state.”⁶

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS’s IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

The lack of consideration of the certainty of flooding in the Altar and Avra Valleys and the subsequent isolation of people and properties from public health and safety responders, not to mention the potential costly relocation of existing infrastructure for the CAP canal, Tucson Water, Marana Water and other regional water providers, numerous El Paso/Kinder Morgan boosting stations, and various electric utility substations is just one example of the flawed NEPA process. This woeful lack of analysis of social, cultural, scientific and economic impacts in the choice of an alternative without adequate due diligence is negligent and should be considered a fatal flaw. This DEIS puts the cart before the horse and would have dire consequences for the region.

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally “endangered” or “threatened,” those identified by the state of Arizona HabiMap (www.habimap.org) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima

⁶ http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf

County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

Aberts towhee
Bell's vireo
Western burrowing owl
Cactus ferruginous pygmy-owl
Western yellow-billed cuckoo
Swainson's hawk
Rufous-winged sparrow
Giant spotted whiptail
Tucson shovel-nosed snake
Pima pineapple cactus
Nichol turk's head cactus
California leaf-nosed bat
Mexican long-tailed bat
Pale Townsend's big-eared bat
Lesser long-nosed bat
Merriam's mouse
Jaguar
Ocelot

Specific impacts to the Tucson shovel-nosed snake

The Tucson shovel-nosed snake (*Chionactis annulata klauberi*) is a small colubrid adapted to the sandy loams of the northeastern Sonoran Desert region of central and southeastern Arizona. It was petitioned for listing as “threatened” or “endangered” under the US Endangered Species Act (ESA) based on its habitat specialization in sandy desert flats subject to agricultural conversion and urban sprawl and its disappearance from the Tucson region (Center for Biological Diversity 2004). The subspecies was defined based on the strong infusion of black pigment on the red crossbands, which may enhance both coral snake mimicry and background-matching via flicker-fusion (Mahrdt et al. 2001). Its geographic range was described by Klauber (1951) and Cross (1979) and additional genetic analysis by Wood et al. (2008, 2014) supported continued recognition of the subspecies but did not define its distributional limits.⁷

⁷ Mahrdt, C.R.; Beaman, K.R.; Rosen P.C.; [et al]. 2001. *Chionactis occipitalis*. Catalog of American Amphibians and Reptiles. 731: 1–12.

Klauber, L.M. 1951. The shovel-nosed snake, *Chionactis* with descriptions of two new subspecies. Transactions of the San Diego Society of Natural History. 11: 141–204.

Cross, J.K. 1979. Multivariate and univariate character geography in *Chionactis* (Reptilia: Serpentes). Dissertation. Tucson, AZ: The University of Arizona. 517 p.
http://arizona.openrepository.com/arizona/bitstream/10150/298514/1/azu_td_7916875_sip1_m.pdf [accessed February 2, 2018].

In 2014 the U.S. Fish and Wildlife Service rejected the snake for ESA listing based on an incorrect range map for the subspecies that included geographic areas within a sister taxon, *C. a. annulata* (USFWS; 2014). In 2018, Bradley and Rosen (in press) produced a more accurate distribution model for the species based on published genetic and distributional data (Figure 1).⁸ They found that 39% of its habitat has been lost to urban development and agriculture and the remaining habitat is in geographically isolated pockets with no genetic connectivity to each other.

The I-11 Recommended Alternative route would have dire consequences for the remaining population of the Tucson shovel-nosed snake through road strikes and further habitat fragmentation. The highway would bisect some of the last intact habitat for the subspecies, including occupied territory within the Avra Valley. Another example of this is evident in the areas between Gila Bend and Maricopa, within and adjacent to the Sonoran Desert National Monument. This has been a reliable place to still see the snake and several individuals have been recorded along highway 238. The Recommended Alternative route would cut through this habitat block and this area would become a population sink as snakes and other wildlife, venturing outside of the monument, would be crushed by trucks and cars.

Further analysis of impacts to the Tucson shovel-nosed snake needs to be completed by the agencies to adequately understand the impacts of corridor alternatives.

Wood, D.A.; Meik, J.M.; Holycross, A.T.; [et al.]. 2008. Molecular and phenotypic diversity in the Western Shovel-nosed snake, with emphasis on the status of the Tucson Shovel-nosed snake (*Chionactis occipitalis klauberi*). *Conservation Genetics*. 9: 1489–1507.

Wood, D.A.; Fisher, R.N.; Vandergast, A.G. 2014. Fuzzy Boundaries: Color and Gene Flow Patterns among Parapatric Lineages of the Western Shovel-Nosed Snake and Taxonomic Implication. *PLoS ONE* 9(5): e97494.

⁸ U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office. 2014. Species Status Report for the Tucson Shovel-Nosed Snake. [Online]. 78 p. Available: <https://www.regulations.gov/document?D=FWS-R2-ES-2014-0035-0002>.

Bradley, C.M. and Rosen, P.R. In Press. Defining suitable habitat and Conservation Status for the Tucson shovel-nosed snake (*Chionactis annulata klauberi*) in the Sonoran Desert. Biodiversity and Management of the Madrean Archipelago IV conference proceedings.

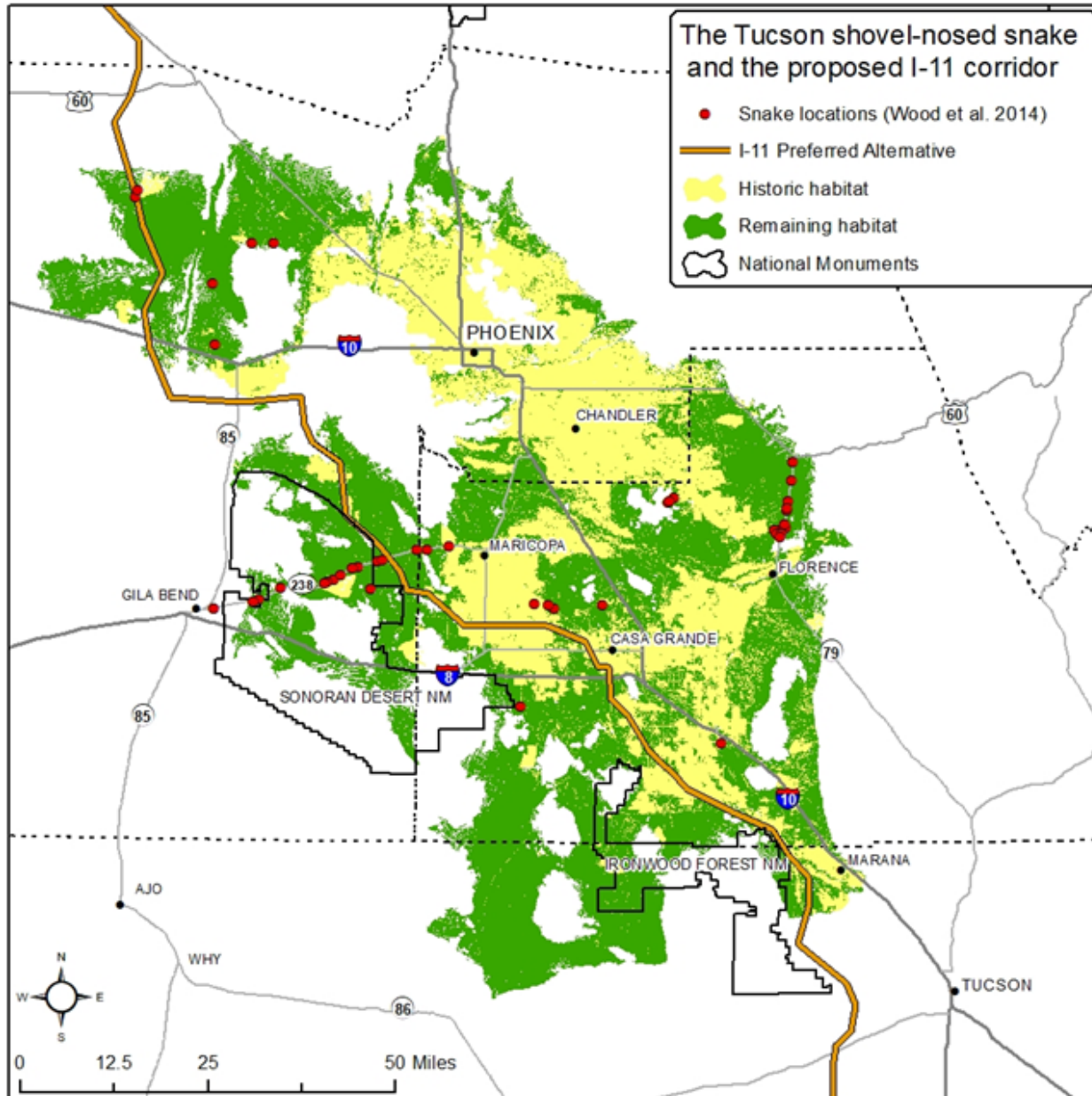


Figure 1: Historic and remaining habitat for the Tucson shovel-nosed snake and the I-11 Recommended Alternative route.

Impacts from noise and light pollution

The Recommended Alternative route would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they use through noise and light pollution. The Recommended Alternative route would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights, street lighting, and from reasonably foreseeable future commercial and residential development.

Impacts to the economy

The Recommended Alternative route runs adjacent to some of southern Arizona's long-standing economic powerhouses, such as the Arizona-Sonora Desert Museum, Saguaro National Park West, and Old Tucson. It also comes perilously close to emerging economic engines such as Ironwood Forest National Monument.

A May 28, 2019 press release directly from Saguaro National Park and the National Park Service stated that, "957,000 visitors to Saguaro National Park in 2018 spent \$62.1 million in communities near the park. That spending supported 866 jobs in the local area, \$31.3 million in labor income and had a cumulative benefit to the local economy of \$90.9 million dollars." The Recommended Alternative route is located within 1,300 feet of the boundary of Saguaro National Park and will have unmitigable impacts on the visitor experience, including increased noise, light, haze and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of viewsheds. None of these impacts can be adequately mitigated.

The Recommended Alternative route is also located within 400 feet of the boundary of Ironwood Forest National Monument, an increasingly popular national monument supported by a robust and active group of volunteers and land managers. A new visitor kiosk was recently installed at IFNM at the Agua Blanca portal and the annual "Meet the Monument" event grows every year, with increasing numbers of participants every year. Building a freeway next to these protected public lands would cause irreparable harm to a place that is gaining momentum and actively investing in the visitor experience.

On April 17, 2019, local newspaper the AZ Daily Star reported on a recent U.S. News and World Report article that identified the Arizona-Sonora Desert Museum as one of the best 30 zoos nationwide. The Recommended Alternative route is located within approximately a half-mile of the Arizona-Sonora Desert Museum. Construction of this route would cause increased noise, light, and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of the viewshed at the museum. None of these impacts can be adequately mitigated.

The Recommended Alternative route would also drive traffic AWAY from Tucson's downtown and growing business districts that rely on traffic from I-19 and I-10 to survive. The City of Tucson resolution adopted unanimously by the Mayor and Council on June 19, 2019 clearly states opposition to the Recommended Alternative route and includes the following statements:

"...Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods.

...Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination.

...In April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district.

...Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics.

...Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations.

...[The] cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson.

...[The] state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions - by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic."

These are all economic arguments for either the No Build alternative or co-locating I-11 with I-19 and I-10 and demonstrate the grave economic consequences to the City of Tucson from the Recommended Alternative route. It is impossible to mitigate for these impacts to Tucson's economy and water supply.

Last, the DEIS needs to improve its analysis of the far-reaching impacts to local governments from building a brand-new freeway in a currently rural area. The Recommended Alternative route would lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other infrastructure and services, the cost of which would likely be borne by local governments such as the City of Tucson, Town of Marana, and Pima County.

Cost of considered alternatives

Our interpretation of the cost of considered alternatives in the DEIS indicates that the Recommended Alternative route would cost approximately \$3.4 billion MORE to construct than the Orange Alternative that co-locates I-11 with I-19 and I-10 in the Tucson region. This estimate is based on information in Table 2-8 on page 2-33 of the DEIS. For Section A-F2, the Green Build Alternative construction costs are estimated to be \$3,998,431,000 and the Orange Build Alternative construction costs are estimated to be \$585,899,000. This leads to the conclusion that it will cost approximately \$3.4 billion more to construct the Green Build Alternative. **We are also unclear why the DEIS does not clearly outline the costs of the Recommended Alternative route (blue on maps), rather leaving it up to the reader to somehow interpret the costs from the other identified routes and where they overlap with**

the Recommended Alternative route. The public should be given clear information for comparison and not be left to make unsure inferences from the incomplete data presented.

One other example of where the DEIS states the costs of considered alternatives in a confusing and incomplete way is in the following section:

Errata 4.5.3

Tunneling – Placing portions of the proposed Project in a tunnel was considered in the property-specific avoidance analysis (Section 4.4.3) as a means to avoid potential impacts to clusters of properties and Historic Districts. FHWA determined that tunneling could result in a use of one or more Section 4(f) properties and, therefore, is not an avoidance alternative. However, even if a way of avoiding use of Section 4(f) properties were to be found, the cost estimate for placing I-11 in a tunnel in Downtown Tucson is approximately \$3.5 to \$5.1 billion, compared to \$240 million for the at-grade concept and \$1 billion for the elevated concept. The extraordinary cost for tunneling indicates that, while tunneling may be feasible, it is not prudent (Avoidance Analysis Factor 4).
Elevated Structures – Elevating I-11 in Downtown Tucson to avoid impacting Section 4(f) properties was considered in the property-specific avoidance analysis (Section 4.4.3.2 and 4.4.3.3). Although the elevated lanes could avoid direct impacts on adjacent Section 4(f) properties, noise and visual impacts would result in adverse effects to historic buildings and structures. Deep excavations for the elevated structure foundations would impact archaeological resources. For these reasons, an elevated lanes alternative through Downtown Tucson is not an avoidance alternative. The elevated alternative also would impact businesses and residences that are not protected by Section 4(f) and would add \$1 billion to the overall capital cost of the Orange Alternative.

It is unclear what specifically the “\$240 million” is referring to in terms of the specific section of highway considered for an at-grade concept. It should also be noted that even though \$1 billion was added to the Orange Alternative in order to elevate I-11 through downtown Tucson, the capital costs would still be \$2.4 billion LESS than the Recommended Alternative route.

In general, we are disappointed with the presentation of the cost of considered alternatives - they are difficult to interpret and should be more clearly and conclusively discussed so compared costs of alternatives are clear to the reader. The examples highlighted above are not exhaustive by any means and we recommend a thorough overhauling of this entire section of the DEIS.

Inadequate 4(F) analysis

The comparison between impacts to the Tucson Mitigation Corridor (TMC) and impacts to the seven historic properties likely to be used if the Orange Alternative is chosen are inadequate as presented in the DEIS.

Use of programmatic “net benefit” evaluation for TMC is inappropriate

Conducting a “net benefit” programmatic evaluation of the proposed use of the TMC is completely inappropriate for this 4(f) property. First, the federal regulations that govern 4(f)

evaluations make clear that the use of programmatic evaluations like the “net benefit” evaluation are to be used only “for certain minor uses of Section 4(f) property.” (23 CFR 774.3(d)) Additionally, per agency guidance, the “net benefit” must be realized on the 4(f) property itself; promising off-site mitigation to offset impacts to a 4(f) property is not the same thing. According to FHWA guidance, a “‘net benefit’ is achieved when the transportation use, the measures to minimize harm, and the mitigation incorporated into the project results in an overall enhancement of the Section 4(f) property... A project does not achieve a “net benefit” if it will result in a substantial diminishment of the function or value that made the property eligible for Section 4(f) protection.”⁹

There is simply no way to achieve a “net benefit” on this 4(f) property, as the use proposed here will, without a doubt, diminish - if not entirely undermine - the ability of the TMC to provide landscape connectivity for wildlife movement. This is especially true considering that this property is itself serving as mitigation for a previous linear project that impacted landscape connectivity in this same area. Regardless of the off-site mitigation promised, it is unlikely that this property will be able to continue to serve as mitigation for that previous project, should this proposed use be approved. **For these reasons, the use of the “net benefit” evaluation for the TMC is simply indefensible. The agencies should conduct an individual evaluation on the TMC property and revise the entire *Draft Preliminary Section 4(f) Evaluation* to consider that individual evaluation.**

Assessment of 4(f) property uses relies on inconsistent information

Because the agencies relied on the incorrect assumption that a “net benefit” would be achieved for the TMC 4(f) property, the DEIS provides no information whatsoever on the actual impacts that may be inflicted on the TMC. No baseline information on the TMC is provided and no information on potential impacts is provided. Without this information, there is no way for the reader to understand what a “net benefit” even means in this context; thus, it is inappropriate to leave this information out. However, because net benefit is inappropriate, it is imperative that the EIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

For example, Google imagery does not provide adequate information for assessing historic integrity and architectural significance for numerous reasons, and there are other far more valid approaches to evaluating such properties that the agencies could have used instead. Acknowledging one of the many pitfalls of this approach, the DEIS admits that “many [properties] were classified as possibly eligible simply because the Google imagery did not provide a clear view.”

In addition, the DEIS is inconsistent in analyzing the costs and feasibility of tunneling through downtown Tucson but does not include a similar analysis of the costs and feasibility of tunneling under the entire 4(f) Tucson Mitigation Corridor.

⁹ “Section 4(f) Evaluation and Approval for Transportation Projects that Have a Net Benefit to a Section 4(f) Property.” Federal Highway Administration Environmental Review Toolkit.
https://www.environment.fhwa.dot.gov/legislation/section4f/4f_netbenefits.aspx.

The DEIS is inconsistent in how it presents information related to the assessment of 4(f) properties. One example of this can be found in a comparison of how information regarding the TMC is represented versus how information regarding the downtown Tucson historic properties is represented. While it is technically true that 15% of the TMC acreage would be within the build corridor (453 out of 2958 acres), far more than just 15% would actually be impacted, considering the purpose for which the TMC was designated (providing landscape connectivity for wildlife movement). In contrast, the EIS asserts that 100% (3 of 3 acres) of the Manning House would be “used;” however, the document goes on to say, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” (EIS at 3.7-24.) Therefore, while 100% of this historic property would be within the corridor, the EIS makes clear that the impact is not 100%. However, with the TMC no parallel consideration of actual impacts is given.

Reliance on insufficient information to compare each Alternative’s potential use of 4(f) properties.

Agencies are required to “identify any methodologies used and shall make explicit reference... to the scientific and other sources relied upon for conclusions in the statement.” (40 CFR 1502.24.) It has long been established that agencies must articulate “a rational connection between the facts found and the choice made.” *Motor Vehicle Mfrs. Ass’n of the U.S. v. State Farm Mut. Auto Ins. Co.*, 463 U.S. 29, 43 (1983).

The flaws resulting from the “net benefit” assumption for TMC aside, the validity of some of the information used to inform the comparison of 4(f) properties is extremely questionable. The information provided for each property is insufficient, in some cases contradictory, and is undermined by inadequate, contradictory information about the properties being compared, and using different metrics.

Scope and Intensity of Impacts to 4(f) properties potentially impacted by Orange Alternative are artificially inflated, while no corollary information is provided for the 4(f) property potentially impacted by the Purple and Green Alternatives.

The DEIS’s comparison of the number of 4(f) properties and their potential use under each alternative is confounding to the reader, precluding meaningful analysis.

Table 4-4 provides the percentage of each 4(f) property located within a build corridor for the various alternatives. However, this information seems to contradict information in the text, causing confusion regarding how potential use of each property is being assessed. This results in a significantly problematic apples-to-oranges comparison of the potential use of each property that tells the reader virtually nothing about the actual potential use of each 4(f) property.

For example, the potential use of the Manning House in downtown Tucson is unclear. First, the property description is inconsistent from one section to the next; on table 4-4 it is described as 1 acre in size, but on table 4-4 it is described as 3 acres in size. Second, Table 4-4 estimates that 100% of the property is subject to “potential use,” but in the text on page 3.7-24 the DEIS

states, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” This indicates that the percentage of “potential use” is not the same as the percentage of the property potentially directly impacted, indicating that indirect impacts are part of the “potential use” consideration. Another example of this is Barrio Anita, where the percentage of the property subject to “potential use” is 85 percent. At the same time, the text states that out of 66 buildings identified in the Barrio Anita Historic District NRHP nomination, the Orange Alternative “could require land from four parcels with contributing residences along the west side of Contzen Avenue but not all of those houses might be directly affected” (EIS at 3.7-24). To make matters more confusing, elsewhere the text states, “The Orange Alternative could require... Removal of at least one historic residential structure adjacent to I-10 in Barrio Anita” (page 4-75). Again, the only explanation for the discrepancy between the percentage of potential use and the amount of land potentially directly impacted is that indirect impacts are considered in the percentage of potential use.

In contrast, the potential use of the TMC property does not appear to include indirect impacts. Table 4-4 shows that only 15% of the property is subject to potential use, with only the percentage of land directly impacted. However, the percentage of potential use would be far larger if indirect impacts are considered for this property, considering how severely compromised the TMC would be as a wildlife movement corridor if an interstate is routed along its entire western boundary or diagonally, from southeast to northwest, through the parcel. There is no explanation for why the TMC is not given the same consideration as the 4(f) properties it is being compared against.

Other discrepancies abound. Page 4-73 provides a list of seven 4(f) properties in downtown Tucson that are subject to potential use by the Orange Alternative, which includes the Barrio Anita Historic District and the David G. Herrera and Ramon Quiroz Park (formerly Oury Park). The analysis uses this number to compare the Orange Alternative’s potential impacts to 4(f) properties to those of the Purple and Green Alternatives, where only one property -- the TMC -- is subject to potential use. However, the text makes clear that Quiroz Park is a contributing property to the Barrio Anita Historic District, and the Park is not listed separately on Table 4-2 or Table 4-4. Inadvertently or otherwise, listing Quiroz Park separately only in this context artificially increases the number of properties potentially impacted by the Orange Alternative and skews the comparison with the Purple and Green Alternatives.

Information provided in Least Harm Analysis is so inadequate it precludes meaningful analysis

Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property

When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, “There is a low ability to mitigate the impacts of the Orange Alternative.”

In addition, on page 4-108 the DEIS states, “After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable...” Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation.

On page 4-96, the DEIS states, “As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property.” This statement explicitly demonstrates skewing of the comparison.

Least harm analysis Factor 3: Relative significance of each Section 4(f) property

The DEIS asserts the following on page 4-97, “FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value.” We strongly disagree with this outlandish statement and urge further evaluation of all Section 4(f) properties. This statement asserts that the entire Tucson Mitigation Corridor is equal to the parking lot of the Manning House, which is a ridiculous and erroneous assertion to make.

Least harm analysis Factor 6

Section 4(f) properties are defined in part as “*publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site).*” The Ironwood Forest National Monument was designated by Presidential Proclamation in June of 2000, under a new protective classification of federal Bureau of Land Management lands. We disagree with the conclusion in the DEIS (Appendix F) that fails to recognize Ironwood Forest National Monument as a Section 4(f) property.

Furthermore, the DEIS fails to consider the magnitude of adverse impacts on multiple properties not protected by Section 4(f). For example, for the Purple and Green Alternatives, this analysis must include the Ironwood Forest National Monument (see above), Tucson Mountain Wildlife Area, and Sonoran Desert National Monument. We believe these properties should be considered as 4(f) properties. However, even though these properties are not considered 4(f) properties, this does not mean there are no adverse impacts to them.

Consideration of other transportation strategies

The DEIS and the choice of the Recommended Alternative route overlooks other less costly options that would encourage the free flow of goods through our region. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;

- Technologies that improve traffic flows;
- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

During the Scoping phase, we strongly recommended a more thorough analysis and consideration of these other transportation strategies that will also better equip our region to adapt to the growing impacts of climate change. Assessing the cumulative impacts of these options on congestion also needs to be more thoroughly considered in the DEIS. **We reiterate our request for this more thorough analysis in future planning efforts and this analysis be completed and shared with the public prior to designating a Preferred Alternative.**

Additional necessary studies

The following studies must be completed prior to designating a Preferred Alternative, with the results communicated to the community and incorporated into the decision process early on:

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the Recommended Alternative route. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Brawley/Los Robles wash system and Santa Cruz River.
- Social and economic equity impacts.

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any Recommended Alternative route. Furthermore, we strongly encourage ADOT and FHWA to refer to the “I-11 Super Corridor Study” final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and the University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Using such studies and designs would help us reduce impacts in Tucson's downtown and surrounding areas should co-location be further considered.

Other factors that must be more thoroughly analyzed for all corridor alternatives include how continued climate change, which is a reasonably foreseeable circumstance, will impact Arizona's water resources and projected population growth; public health implications,

including increased air pollution and the proliferation of valley fever; and long-term impacts on local and regional land-use plans.

The Recommended Alternative route through Avra Valley would facilitate commercial and residential development in this area. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.

Considering the identified Recommended Alternative route in the DEIS, we argue that either the No Build alternative or improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental and larger community impacts. **Because of this, we stand in strong opposition to the Recommended Alternative route.**

Local government opposition

In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 (attached) opposing “the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.” Additionally, the Board called for the expansion of “capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.”

Additionally, in April 2019 Pima County Board of Supervisors’ Chair Richard Elías and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, “The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through ‘invaluable Sonoran Desert areas.’ That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it” (attached). We strongly concur with Pima County’s elected officials and their resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, “The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction

of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately mitigated and that are contrary to the interstate design standards and criteria that must be applied to the project.”

On May 18, 2019, Arizona District 3 Congressman Raúl Grijalva submitted comments on the DEIS voicing his opposition to the Recommended Alternative route. We have attached the Congressman’s letter as well.

Thank you for the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. **Given the far-reaching and devastating impacts that the Recommended Alternative route would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, we express our strong opposition to the Recommended Alternative route and feel that should additional capacity be warranted, that reconfiguration of existing highways is the only acceptable Alternative. This DEIS is replete with inadequate analyses and is, in and of itself, a fatal flaw.** We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jodi Netzer, Director
Tucson Entrepreneurs

Robin Clark *for*
Avra Valley Coalition

Tom Hannagan, President
Friends of Ironwood Forest

Louise Misztal, Executive Director
Sky Island Alliance

Barbara Rose, Project Coordinator
Safford Peak Watershed Education Team

Diana Hadley, Co-President
Northern Jaguar Project

Demion Clinco, President
Tucson Historic Preservation Foundation

Sandy Bahr, Chapter Director
Sierra Club - Grand Canyon Chapter

Meg Weesner, Chair
Sierra Club - Rincon Group

Emily Yetman, Executive Director
Living Streets Alliance

Kevin Gaither-Banchoff, Development
Director
WildEarth Guardians

Peter Chesson, President
Tucson Mountains Association

Gayle Hartmann, President
Save the Scenic Santa Ritas

Robert Villa, President
Tucson Herpetological Society

Terry Majewski, Chair
Tucson-Pima Historical Commission

Ivy Schwartz, President
Community Water Coalition of Southern
Arizona

Jonathan Lutz, Executive Director
Tucson Audubon Society

Nancy Williams, President
People for Land and Neighborhoods

Fred Stula, Executive Director
Friends of Saguaro National Park

Pearl Mast and Anna Lands, Co-Chairs
Conservation Committee
Cascabel Conservation Association

Randy Serraglio, Southwest Conservation
Advocate
Center for Biological Diversity

Myles Traphagen, Borderlands Project
Coordinator
Wildlands Network

Gary Kordosky, President
Gates Pass Area Neighborhood Association

Della Grove, President
Citizens for Picture Rocks

Jessica Moreno, President
Arizona Chapter of The Wildlife Society

Mike Quigley, Arizona State Director
The Wilderness Society

Robert Peters, Southwest Representative
Defenders of Wildlife

Attachments: April 2019 Memo from Pima County Supervisors Richard Elías and Sharon
Bronson
Pima County Resolution No. 2007-343
City of Tucson Resolution No. 23051
May 2019 Letter from Rep. Raúl Grijalva (D-AZ)

ATTACHMENTS

April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson



PIMA COUNTY BOARD OF SUPERVISORS

130 WEST CONGRESS STREET, 11th FLOOR
TUCSON, ARIZONA 85701-1317

(520) 724-8126
district5@pima.gov
www.district5.pima.gov

To Whom it May Concern:

The Pima County Board of Supervisors adopted Resolution No. 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through "invaluable Sonoran Desert areas." That remains the official position of Pima County government.

At the time, the proposal under consideration was for an Interstate 10 Bypass Freeway, but it was along the same suggested routes as the currently proposed Interstate 11. A "favored" route then, as now, was through Avra Valley.

A freeway through the Avra Valley or other parts of the delicate Sonoran Desert is not compatible with the county's landmark Sonoran Desert Conservation Plan or with its Sustainability Plan to combat climate change in line with the 2015 Paris Agreement.

A freeway would destroy sensitive habitat for many of the 44 unique species of concern that the Conservation Plan protects. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn.

The Sustainability Plan aims to steer the county government operations away from fossil fuel use and dependency, and a new freeway would promote increased fossil-fuel use, to the detriment of our air quality as well as to climate change.

A freeway through Avra Valley would impact severely and negatively such jewels and tourist areas as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Arizona-Sonora Desert Museum. It would diminish vastly the quality of life of thousands of Avra Valley residents.

The cost of buying land for and building an entirely new freeway would be tremendous, when we do not have enough funds to maintain properly our existing roads and highways. It would cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

An Interstate 11 would divert traffic away from existing businesses that depend on Interstate 10 and Interstate 19 traffic visibility for their survival.

A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it.

Sincerely,

Richard Elías, Chairman
Pima County Board of Supervisors

Sharon Bronson, District Three Supervisor
Pima County Board of Supervisors

RESOLUTION NO. 2007- 343

**A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS IN
OPPOSITION TO CONSTRUCTION OF AN INTERSTATE HIGHWAY LINK
THAT BYPASSES TUCSON AND TRAVERSES PRISTINE AND INVALUABLE
SONORAN DESERT AREAS**

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

WHEREAS, Pima County has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel to this effort because of their greenhouse-gas and pollutant emissions, and therefore calls for the County to shift its fleet to use alternative fuels; and

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new controlled-access highway would be enormous, requiring the acquisition of thousands of acres of new rights of way, expenditures on high and rapidly increasing costs of concrete and asphalt, putting a tremendous burden on taxpayers and future highway users; and

WHEREAS, the production of the millions of tons of concrete and asphalt for this massive construction project would cause significant air pollution and greenhouse gas emissions, as would the operation of heavy machinery in the construction process; and

WHEREAS, a new controlled-access highway near or through Pima County on any route, would promote urban sprawl, causing local governments to incur large financial responsibilities for new infrastructure costs and force major changes to existing county land-use and zoning designations; and

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; and

WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.


2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.


Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:


Clerk of the Board
Deputy County Attorney

ADOPTED BY THE
MAYOR AND COUNCIL

June 18, 2019

RESOLUTION NO. 23051

RELATING TO PUBLIC HEALTH AND SAFETY: DECLARING MAYOR AND COUNCIL'S OPPOSITION TO CONSTRUCTION OF A NEW INTERSTATE HIGHWAY THAT BYPASSES THE CITY OF TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS; AND DECLARING AN EMERGENCY.

WHEREAS, the City of Tucson (Tucson) works to advance goals of sustainability, equity, economic growth and vibrant, livable neighborhoods; and

WHEREAS, in November 2013 Tucson voters adopted Plan Tucson, the City of Tucson General Plan & Sustainability Plan; and

WHEREAS, Tucson has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel because of their greenhouse-gas and pollutant emissions; and

WHEREAS, Plan Tucson seeks to create, preserve, and manage biologically rich, connected open space; wildlife and plant habitat; and wildlife corridors, including natural washes and pockets of native vegetation, while working to eradicate invasive species; and

WHEREAS, an interstate highway in the Avra Valley would degrade the Sonoran Desert, sever wildlife corridors, impede washes and flood prone areas, open new areas to intense residential and commercial development

far from existing urban centers, and encourage more car and truck travel at time when climate change and air pollution are growing concerns; and

WHEREAS, Tucson strives to protect night skies from light; and

WHEREAS, Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods; and

WHEREAS, Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination; and

WHEREAS, in April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district; and

WHEREAS, Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics; and

WHEREAS, Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations; and

WHEREAS, the Interstate 11 Draft Tier 1 Environmental Impact Statement Recommended Alternative route would run through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park - West, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona

Project mitigation parcel, and severing linkages between important habitat areas and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson; and

WHEREAS the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions – by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately

mitigated and that are contrary to the interstate design standards and criteria that must be applied to this project.

SECTION 2. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City of Tucson that this Resolution become immediately effective, an emergency is hereby declared to exist and this Resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Tucson, Arizona, June 18, 2019.

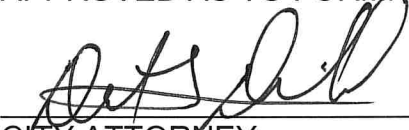
MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM:

REVIEWED BY:



JCP CITY ATTORNEY

CITY MANAGER

MR/dg
6/13/19

COMMITTEE ON NATURAL RESOURCES
CHAIRMAN

COMMITTEE ON EDUCATION AND LABOR
HIGHER EDUCATION AND WORKFORCE INVESTMENT
SUBCOMMITTEE

CIVIL RIGHTS AND HUMAN SERVICES SUBCOMMITTEE

CONGRESSIONAL PROGRESSIVE CAUCUS
CHAIR EMERITUS

Congress of the United States
House of Representatives
Washington, DC 20515-0307

WEBSITE: <http://grijalva.house.gov/>

May 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

Also emailed to: I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Dear Mr. Van Echo,

I would like to take this opportunity to provide input during the public comment period on the Draft Tier 1 EIS referenced above.

I am concerned that the current comment period is too short for a comprehensive review of this extremely large document (762 pages plus appendices). I request that the comment period be extended for a total of 120 days—which is common for projects of this magnitude and controversy—making the revised due date for comments August 3, 2019.

I support efforts to physically connect Arizona and Nevada via transportation corridors to facilitate Canadian and Mexican trade routes. The City of Tucson and the metro region of Pima County would benefit most by enhancing existing infrastructure that already provides the connection: Interstate 10 and 19, or option “A” and “B” that have been included in your route studies.

I am **very concerned** that a hybrid option of routes going through Altar and Avra Valley has instead been chosen for the preferred alternative in the Draft Tier 1 EIS. This route would necessitate building new interstate. This route would negatively impact rural communities in Avra Valley, Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and other protected open spaces and wildlife corridors. I pointed this out during the scoping process in a June 1, 2017, letter to project manager Jan Van Echo. For the record I would like to repeat my concerns:

This proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values, and quality of life for residents of that community. Even a limited access roadway would still open this mainly undeveloped area to massive sprawl. Residents of my district affected by this option have called my office expressing these same concerns. Pima County voters have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, the Federal Highway Administration and the Arizona Department of Transportation must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concerns expressed

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FACEBOOK: [Facebook.com/Rep.Grijalva](https://www.facebook.com/Rep.Grijalva)
TWITTER: [Twitter.com/RepRaulGrijalva](https://twitter.com/RepRaulGrijalva)
INSTAGRAM: [Instagram.com/RepRaulGrijalva](https://www.instagram.com/RepRaulGrijalva)

all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

One explanation for this conclusion is that a Tier 1 analysis is not enough for a federal process to come up with the better route alternative. The tiering of the required environmental compliance means that the decision is not informed by the best information and that vague promises of future mitigation is enough to allow the incredible decision to bisect an important wildlife mitigation area with a major freeway. This calls into question the Department of Transportation's unusual practice of coming to a decision without the full environmental compliance that most other federal projects regularly require.

A proposed MOU giving the state environmental compliance responsibilities for federal highway projects in Arizona, which would include the Tier 2 study, further demonstrates the inappropriate fragmentation of planning and compliance this project will receive, especially compared to projects with this sort of impact on protected lands that our community would normally expect.

Another issue of concern is the regularity with which this route keeps re-surfacing. Voters overwhelmingly voted against a ½ cent sales tax that would have funded a similar project back in the mid-1980s. The Picture Rocks community along with many other Pima Country residents and organizations have and continue to vocally oppose it, yet this route keeps being promoted as the preferred option.

Very little is being done to address alternatives to continuous freeway expansion, such as facilitating the expansion and use of intermodal shipping yards, facilitating the creation of public rail transportation lines as alternatives to continuously promoting freeway development—especially in pristine habitat corridor areas. I consistently remain opposed to any highway plan that opens up the Avra valley to widespread environmental destruction.

The possible fast tracking of this project, despite information typically disseminated by the project's managers at public meetings that there is not current funding available, is concerning. While that may be currently true, this project is in conjunction with the Federal Highway Administration, I-11 and Intermountain West Corridor Study (IWCS) completed in 2014. With talk in Congress about developing an infrastructure spending package, the state appears to be attempting to remove all barriers to fast tracking this project once, and if, funding is available. If Congress is able to pass an infrastructure package, the voters will have no say, as planning will be completed, and routes will have been previously selected.

If the project's purpose is to provide a high-priority north to south transportation corridor to connect to major metropolitan areas and markets with Mexico and Canada, then I believe that the best option is using Interstate 10 and 19, which already includes metropolitan Tucson and protects the environmentally sensitive area west of Tucson.

Thank you for your time and the opportunity to provide input.

Sincerely,



Raúl M. Grijalva,
Member of Congress, (AZ-03)

Cc: Jan Van Echo, PE, ADOT I-11 Study Manager



CANNON CONSULTANTS, LLC

417 S. 4TH AVENUE • TUCSON, ARIZONA 85701

PHONE: (602) 738-3983

EMAIL: jerryacannon@gmail.com

May 17, 2019

Cannon, J
I-3238

Arizona Dept. of Transportation
% ADOT Communications
1655 W. Jackson Street, MD 126F
Phoenix, AZ 85007

RE: Intermountain West Corridor – Future Interstate I-11 through Avra Valley

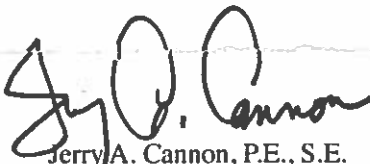
Dear Sirs:

After reviewing the proposed I-11 Freeway route around Tucson through Avra Valley and connecting to I-19, it just doesn't make sense and the whole concept of another freeway should be abandoned. What is needed is to widen I-10 to carry the increased traffic and to discourage the freeway use by trucks that increase accidents and the heavy loads cause the roads to deteriorate sooner.

The thinking of the 1950-1960s about more is better resulted in the building of more freeways which tends to destroy the communities and causes environmental damage. The truck lobby seems to be strong and well-funded in Arizona but another freeway in Pima County is not wanted or needed. We need to rely more on the railroads to transport goods and materials and less on trucks. Currently, there is only one train a day into Nogales so by using the railroads more and fewer trucks, we would be better off.

The proposed I-11 freeway through Avra Valley and then connecting with I-19 is just more of the same and I suggest that if more lanes are needed then widen the I-10 freeway. That widening should begin in Phoenix and continue through southern Arizona. I strongly oppose the I-11 freeway route through Avra Valley.

Sincerely,


Jerry A. Cannon, P.E., S.E.
Civil Engineer



CANNON CONSULTANTS, LLC
417 S. 4th Avenue
Tucson, Arizona 85701

PHOENIX AZ 852

20 MAY 2019 PM 10 L



Arizona Rent of transportation
3 ADOT Communications
1655 W. Jackson Street, MD126 F
Phoenix, Arizona

85007

85007-327999



7/7/19

Carichner, J
I-3532

To Whom It May Concern,

I am reaching out to those of you in a position to make a real difference in the future of the magnificent beauty and wildness of Saguaro National Park. I am certain you have looked at this proposal from all angles, so I will not speak to the economic or environmental impacts. I am speaking as lover of the desert around Tucson and a citizen of this magnificent city. When my husband and I decided to get married, we knew without a doubt that the place we wanted to celebrate our loving union was Saguaro West. This park is the heart of the Southwest. The spectacular majesty of the ancient Saguaros, the peace and quiet of the desert, the abundant wildlife, the unparalleled natural beauty. These were the qualities we wanted to bring to our ceremony. This was the place we

wanted our out-of-town relatives to
experience and think of when they remember
that day of love.

The proposed I-11 would so greatly
diminish that area, bring noise, disruption
to wildlife, destruction of so many mighty
Saguaros. Generations to come deserve
as many pristine, wild places as we
can possibly save. Please think
about the future of our beloved National
monument and preserve it for future
brides and grooms to celebrate love.

In Deep Gratitude,

Joanna Carichner

A stylized handwritten signature in blue ink, consisting of a large 'J' followed by a series of loops and a horizontal line.

Roger & Judy Carpenter
1124 N. Camino de Oeste Tucson AZ 85745
Ph. (520) 622-4070
rogercarpenter6@icloud.com judith36carpenter@icloud.com

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street
Mail Drop 126F
Phoenix, AZ 85007

July 25, 2019

Our objections to Freeway I-11 through Avra Valley

Dear Department of Transportation:

On May8, 2019, I attended the presentations by ADOT on the suggested route for a new freeway through Avra Valley. I am writing to express my concern about two aspects of this program.

First, I attended hoping to see presented and compared both possibilities -- the Fwy I-11 vs. the "No build" route through Tucson. The latter was simply dismissed. The rest of the material, including the video, the printed handouts, and discussion with ADOT employees was a blatant sales pitch! Adding to my disappointment was the lack of knowledge among what must have been at least thirty ADOT employees there. They did not even know some of the material that I later found was in the handout. They stated that the drive from Nogales to Wickenburg would be shortened. By how much, I asked, No one knew, but in the handout, it said by one hour -- in 2040 !

No one could tell me how this route would affect eastbound truck traffic from Los Angeles, nor westbound trucks from El Paso which make up a large fraction of truck traffic through Tucson and to Phoenix. No one would offer any general estimate of the cost of this route, vs. the "no build" route through Tucson. For an event designed to inform citizens about aspects of the choices that should be before us, it failed miserably.

Second, Regardless of the cost of the Avra Valley route, it should *not* be pursued. The immediate impact will be traffic near the Arizona Sonora Desert Museum and Saguaro National Park West, both day and night! And construction of the road and subsequent use will ruin the lives of people who have moved to the valley to escape what the freeway will now bring to their doors. Shouldn't their concerns be honored?

And what will be the effects five years (or less) after the freeway is in operation? First, truck stops, and fast food joints. then motels, then houses for the people employed at these places. In effect, this will start a new smear of development through generally undisturbed land in order to save an hour's time driving from Nogales to Kingman.

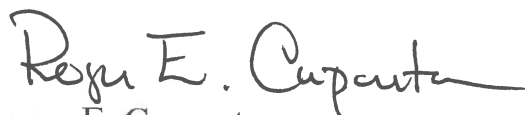
Lastly, How does ADOT justify the expense of \$3.4 billion over the cost of improvements to the "No Build" route through Tucson?

The southern and western states are growing too rapidly as it is, as people move from the midwest and upper eastern states. Phoenix is now the fastest growing city in the U.S. If people want to live in the congested mess that is Phoenix, let them But we should not encourage further suburban sprawl at the cost of our precious natural regions.

Please listen to the concerns of the residents who will be affected by this, and to the voice of the Tucson City Council, unanimously opposed. We ask that this route *never* be built or approved. Find a less damaging way to get materials to Wickenburg or Nevada, PLEASE.

Thank you for your attention.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Roger E. Carpenter". The signature is fluid and cursive, with a long horizontal stroke at the end.

Roger E. Carpenter
Native Tucsonan and
resident of the Tucson Mountains.

Buckeye Irrigation Company

205 E Roosevelt Ave. Buckeye, AZ. 85326

To whom it may concern,

On behalf of the Buckeye Irrigation Company, I Noel Carter, Manager of the BIC, is submitting this letter to oppose ADOTS proposed alignment of I-11 and to support the City of Buckeye's proposed Palo Verde Route.

I am **opposed** to the I-11 ADOT Recommended Alternative alignment for the following reasons.

- It will be located very close (.5 miles) to Palo Verde Elementary School.
- It will cross the Buckeye Water Conservation & Drainage Districts main canal multiple times impacting irrigation delivery infrastructure.
- It impacts two (2) different dairy farm operations.
- It will be located within close proximity (less than 1/2 mile) to existing subdivisions.
- It bisects multiple existing farms into two separate areas causing major impacts to farming operations.

I **support** the I-11 Alternative Route – Palo Verde Area for the following reasons.

- This alignment only crosses the Buckeye Canal once and will have minimal impacts on long standing regional irrigation facilities.
- This route would continue to provide access to the planned industrial components in this portion of the city.
- As it would be located on the north bank of the river and the southern portion of the agricultural farming in the area, the freeway will not bisect multiple existing farms into two separate areas preventing major impacts to farming operations.
- It will provide flood protection for the adjacent properties allowing the land to become developable.
- It will also have minimal impacts to existing communities, as there are fewer structures within the suggested study area.

Sincerely,

Noel Carter

Noel Carter
Manager,
Buckeye Irrigation Company

Buckeye Water Conservation & Drainage District

205 E Roosevelt Ave. Buckeye, AZ. 85326

To whom it may concern,

On behalf of the Buckeye Water Conservation & Drainage District, I Noel Carter, General Manager of the District, is submitting this letter to oppose ADOTS proposed alignment of I-11 and to support the City of Buckeye's proposed Palo Verde Route.

I am opposed to the I-11 ADOT Recommended Alternative alignment for the following reasons.

- It will be located very close (.5 miles) to Palo Verde Elementary School.
- It will cross the Districts main canal multiple times impacting irrigation delivery infrastructure.
- It impacts two (2) different dairy farm operations.
- It will be located within close proximity (less than ½ mile) to existing subdivisions.
- It bisects multiple existing farms into two separate areas causing major impacts to farming operations.

I support the I-11 Alternative Route – Palo Verde Area for the following reasons.

- This alignment only crosses the Buckeye Canal once and will have minimal impacts on long standing regional irrigation facilities.
- This route would continue to provide access to the planned industrial components in this portion of the city.
- As it would be located on the north bank of the river and the southern portion of the agricultural farming in the area, the freeway will not bisect multiple existing farms into two separate areas preventing major impacts to farming operations.
- It will provide flood protection for the adjacent properties allowing the land to become developable.
- It will also have minimal impacts to existing communities, as there are fewer structures within the suggested study area.

Sincerely,

Noel Carter

Noel Carter
General Manager,
BWCD



Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 * sonorandesert.org

Arizona Center for Law in the Public Interest * Arizona Native Plant Society * Bat Conservation International * Cascabel Conservation Association * Center for Biological Diversity * Center for Environmental Ethics * Defenders of Wildlife * Desert Watch * Environmental Law Society * Friends of Cabeza Prieta * Friends of Ironwood Forest * Friends of Madera Canyon * Friends of Saguaro National Park * Friends of Tortolita * Gates Pass Area Neighborhood Association * Genius Loci Foundation * Native Seeds / SEARCH * Protect Land and Neighborhoods * Safford Peak Watershed Education Team * Save the Scenic Santa Ritas * Sierra Club – Grand Canyon Chapter * Sierra Club – Rincon Group * Sky Island Alliance * Society for Ecological Restoration * Southwestern Biological Institute * Tortolita Homeowners Association * Tucson Audubon Society * Tucson Herpetological Society * Tucson Mountains Association * Wildlands Network

July 4, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg*. We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection and the undersigned organizations.

Overview

In summary, we are in strong opposition to the Recommended Alternative route identified in the I-11 Tier 1 DEIS (“DEIS”). Our opposition is rooted in the major negative environmental and economic impacts that would inevitably occur if the Recommended Alternative route is successfully built and our belief that other transportation alternatives, including improving and expanding existing interstates, a focus on multi-modal solutions, and the inclusion of expanded rail service, could more effectively achieve the goals identified in the DEIS.

The Recommended Alternative route would have grave and devastating impacts to Pima County that cannot be adequately mitigated. These include:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation’s Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County’s Conservation Lands System.
- Impacts to planned mitigation lands for Pima County’s Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

- Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona's Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.
- Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water's CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- Impacts to Tucson's businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
- Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
- Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.

We believe that these impacts cannot be adequately mitigated.

Purpose and Need

First and foremost, we strongly believe that ADOT and FHWA have failed to clearly and thoroughly demonstrate the need for construction of an entirely new freeway, based on the best available science and data. ADOT and FHWA should analyze not only the most current transportation and growth models and current and projected traffic volumes, but also changing transportation modes. For example, if the Mariposa Point of Entry was fully staffed and operational 24 hours a day (which it currently is not), the currently required overnight parking would be reduced, spreading out traffic volumes throughout the day (and also decreasing air pollution since refrigerated trucks have to stay running all night long while they are parked), and negating the need for this proposal at all. Additionally, autonomous truck testing is currently occurring in southern Arizona, is expected to continue, and could safely accommodate truck traffic at night or in a designated lane.¹

The following planned projects should be analyzed by ADOT and FHWA:

- Plans to continue widening Interstate 10.

¹ <https://www.wired.com/story/embark-self-driving-truck-deliveries/>
https://tucson.com/business/pcc-tusimple-team-up-to-offer-self-driving-truck-operations/article_fb05bf3e-ba44-5dfd-ab23-dd6975cd509a.html

- Elements of ADOT's 2017-2021 Five Year Plan to include, but not be limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.
- ADOT's 2011 "State Rail Plan," which was developed to address the needs of both freight and passengers.²

Also, of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of \$54 million secured in a highway grant for ADOT's I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation's competitive FASTLANE program. Tucson Mayor Rothschild said, "Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that's very good news for Tucson, Phoenix and the state as a whole."³

Concerns with the overall NEPA process

We have serious concerns about the larger NEPA process and the premature identification of a "Recommended Alternative" route without adequate scientific and economic analysis and environmental studies. We question the ability of the involved agencies to present thorough information to the public about the myriad impacts of the Recommended Alternative route, and other considered alternatives, given the inadequate analysis presented in the DEIS. **We fully support and incorporate by reference the full comments on the I-11 DEIS submitted by the National Parks Conservation Association in July 2019, including a more detailed analysis on this issue.**

Major Environmental Impacts from the Recommended Alternative Route

Impacts to Federal and Local Protected Areas

The Recommended Alternative route would have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the significant biological and cultural resources they contain. The Recommended Alternative route would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County's federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan, which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and *mitigation lands in Avra Valley are critical to its long-term success with special emphasis on riparian areas*. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014, and this HCP is currently under

² See: <https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0>. This rail plan was based off of this study completed in 2010: <https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0>

³ See <http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

review. Meanwhile, Tucson Water's operations in Avra Valley are planned and conducted as if the HCP is already in full effect. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are as important to consider as federal conservation lands in Pima County. Unfortunately, impacts to local conservation lands have not been adequately addressed and analyzed in the documents related to this process, including the DEIS. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their federal Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are in Avra Valley and directly in the path of the Recommended Alternative route. It is disappointing to see a total lack of acknowledgement of these important local conservation lands in the DEIS and in recent public presentations and materials - any review of environmental impacts should address impacts to local conservation lands in detail, particularly in light of the fact that these protections are a result of a federal Incidental Take Permit.

Impacts to Wildlife Linkages

The Recommended Alternative route would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.⁴

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the

⁴ Arizona Wildlife Linkages Assessment: <https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>

isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, wildlife genetic health, and overall ecosystem resilience in this area.

Impacts to local wildlife linkages are not adequately addressed in the DEIS and adequate mitigation for impacts resulting from the Recommended Alternative route are not possible.

Impacts to Pima County's Conservation Lands System

The Recommended Alternative route would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. **We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS are not adequately addressed in the DEIS. The Recommended Alternative route would damage CLS mitigation lands to such an extent that the integrity of Pima County's federal ITP permit would be compromised. Again, adequate mitigation for these impacts is not possible.⁵**

Impacts to Riparian Habitat

The Recommended Alternative route would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest

⁵ Pima County's Conservation Lands System Map and Policies:

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf

The full text of the MSCP, Annual Reports, maps, and other important information can be found at:
<http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=52674>

More information on Pima County's Sonoran Desert Conservation Plan can be found at:
http://webcms.pima.gov/government/sustainability_and_conservation/conservation_science/the_sonoran_desert_conservation_plan/

region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

“Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state.”⁶

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS’s IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

The lack of consideration of the certainty of flooding in the Altar and Avra Valleys and the subsequent isolation of people and properties from public health and safety responders, not to mention the potential costly relocation of existing infrastructure for the CAP canal, Tucson Water, Marana Water and other regional water providers, numerous El Paso/Kinder Morgan boosting stations, and various electric utility substations is just one example of the flawed NEPA process. This woeful lack of analysis of social, cultural, scientific and economic impacts in the choice of an alternative without adequate due diligence is negligent and should be considered a fatal flaw. This DEIS puts the cart before the horse and would have dire consequences for the region.

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally “endangered” or “threatened,” those identified by the state of Arizona HabiMap (www.habimap.org) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima

⁶ http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf

County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

Aberts towhee
Bell's vireo
Western burrowing owl
Cactus ferruginous pygmy-owl
Western yellow-billed cuckoo
Swainson's hawk
Rufous-winged sparrow
Giant spotted whiptail
Tucson shovel-nosed snake
Pima pineapple cactus
Nichol turk's head cactus
California leaf-nosed bat
Mexican long-tailed bat
Pale Townsend's big-eared bat
Lesser long-nosed bat
Merriam's mouse
Jaguar
Ocelot

Specific impacts to the Tucson shovel-nosed snake

The Tucson shovel-nosed snake (*Chionactis annulata klauberi*) is a small colubrid adapted to the sandy loams of the northeastern Sonoran Desert region of central and southeastern Arizona. It was petitioned for listing as “threatened” or “endangered” under the US Endangered Species Act (ESA) based on its habitat specialization in sandy desert flats subject to agricultural conversion and urban sprawl and its disappearance from the Tucson region (Center for Biological Diversity 2004). The subspecies was defined based on the strong infusion of black pigment on the red crossbands, which may enhance both coral snake mimicry and background-matching via flicker-fusion (Mahrdt et al. 2001). Its geographic range was described by Klauber (1951) and Cross (1979) and additional genetic analysis by Wood et al. (2008, 2014) supported continued recognition of the subspecies but did not define its distributional limits.⁷

⁷ Mahrdt, C.R.; Beaman, K.R.; Rosen P.C.; [et al]. 2001. *Chionactis occipitalis*. Catalog of American Amphibians and Reptiles. 731: 1–12.

Klauber, L.M. 1951. The shovel-nosed snake, *Chionactis* with descriptions of two new subspecies. Transactions of the San Diego Society of Natural History. 11: 141–204.

Cross, J.K. 1979. Multivariate and univariate character geography in *Chionactis* (Reptilia: Serpentes). Dissertation. Tucson, AZ: The University of Arizona. 517 p.
http://arizona.openrepository.com/arizona/bitstream/10150/298514/1/azu_td_7916875_sip1_m.pdf [accessed February 2, 2018].

In 2014 the U.S. Fish and Wildlife Service rejected the snake for ESA listing based on an incorrect range map for the subspecies that included geographic areas within a sister taxon, *C. a. annulata* (USFWS; 2014). In 2018, Bradley and Rosen (in press) produced a more accurate distribution model for the species based on published genetic and distributional data (Figure 1).⁸ They found that 39% of its habitat has been lost to urban development and agriculture and the remaining habitat is in geographically isolated pockets with no genetic connectivity to each other.

The I-11 Recommended Alternative route would have dire consequences for the remaining population of the Tucson shovel-nosed snake through road strikes and further habitat fragmentation. The highway would bisect some of the last intact habitat for the subspecies, including occupied territory within the Avra Valley. Another example of this is evident in the areas between Gila Bend and Maricopa, within and adjacent to the Sonoran Desert National Monument. This has been a reliable place to still see the snake and several individuals have been recorded along highway 238. The Recommended Alternative route would cut through this habitat block and this area would become a population sink as snakes and other wildlife, venturing outside of the monument, would be crushed by trucks and cars.

Further analysis of impacts to the Tucson shovel-nosed snake needs to be completed by the agencies to adequately understand the impacts of corridor alternatives.

Wood, D.A.; Meik, J.M.; Holycross, A.T.; [et al.]. 2008. Molecular and phenotypic diversity in the Western Shovel-nosed snake, with emphasis on the status of the Tucson Shovel-nosed snake (*Chionactis occipitalis klauberi*). *Conservation Genetics*. 9: 1489–1507.

Wood, D.A.; Fisher, R.N.; Vandergast, A.G. 2014. Fuzzy Boundaries: Color and Gene Flow Patterns among Parapatric Lineages of the Western Shovel-Nosed Snake and Taxonomic Implication. *PLoS ONE* 9(5): e97494.

⁸ U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office. 2014. Species Status Report for the Tucson Shovel-Nosed Snake. [Online]. 78 p. Available: <https://www.regulations.gov/document?D=FWS-R2-ES-2014-0035-0002>.

Bradley, C.M. and Rosen, P.R. In Press. Defining suitable habitat and Conservation Status for the Tucson shovel-nosed snake (*Chionactis annulata klauberi*) in the Sonoran Desert. *Biodiversity and Management of the Madrean Archipelago IV conference proceedings*.

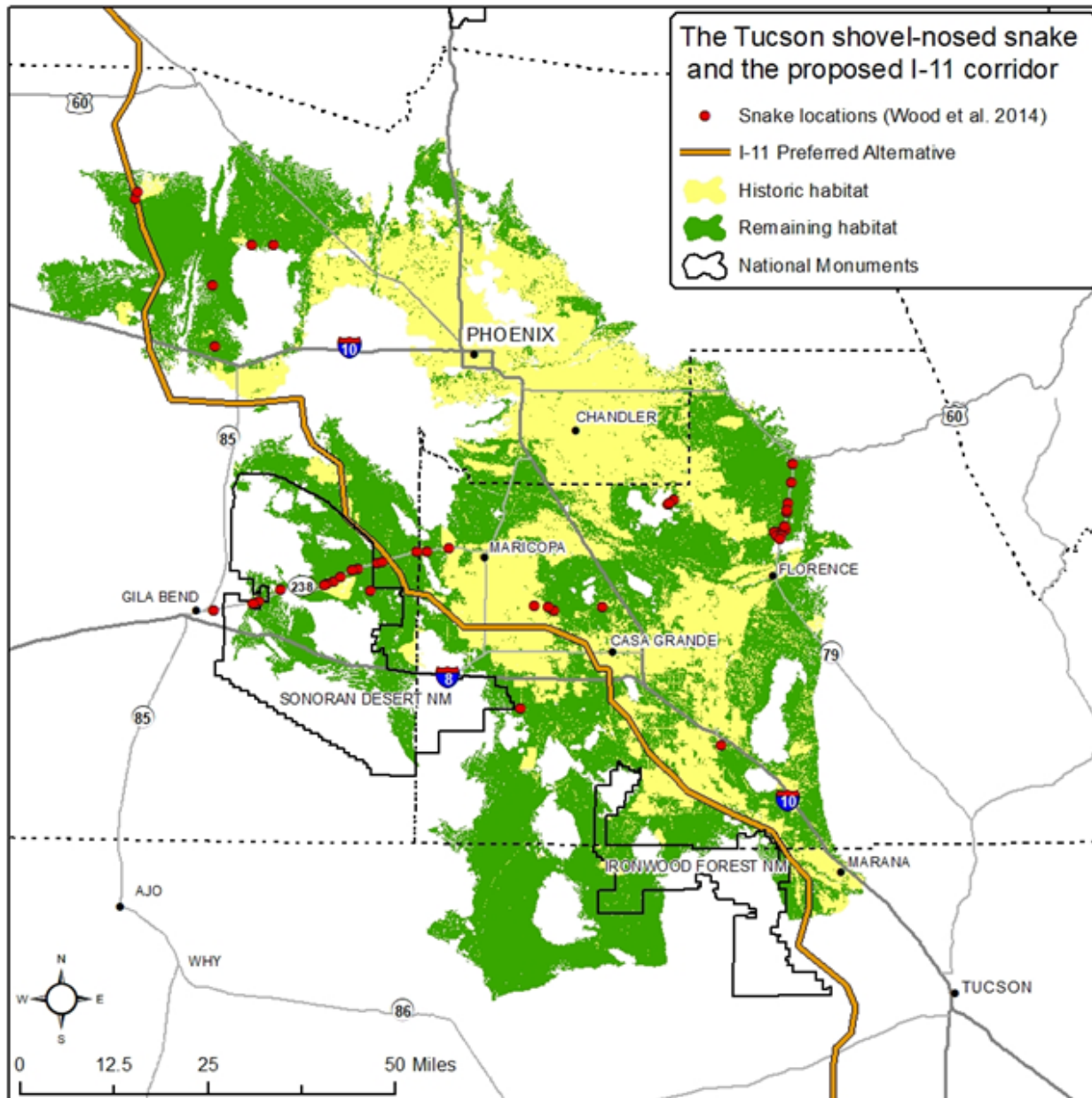


Figure 1: Historic and remaining habitat for the Tucson shovel-nosed snake and the I-11 Recommended Alternative route.

Impacts from noise and light pollution

The Recommended Alternative route would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they use through noise and light pollution. The Recommended Alternative route would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights, street lighting, and from reasonably foreseeable future commercial and residential development.

Impacts to the economy

The Recommended Alternative route runs adjacent to some of southern Arizona's long-standing economic powerhouses, such as the Arizona-Sonora Desert Museum, Saguaro National Park West, and Old Tucson. It also comes perilously close to emerging economic engines such as Ironwood Forest National Monument.

A May 28, 2019 press release directly from Saguaro National Park and the National Park Service stated that, "957,000 visitors to Saguaro National Park in 2018 spent \$62.1 million in communities near the park. That spending supported 866 jobs in the local area, \$31.3 million in labor income and had a cumulative benefit to the local economy of \$90.9 million dollars." The Recommended Alternative route is located within 1,300 feet of the boundary of Saguaro National Park and will have unmitigable impacts on the visitor experience, including increased noise, light, haze and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of viewsheds. None of these impacts can be adequately mitigated.

The Recommended Alternative route is also located within 400 feet of the boundary of Ironwood Forest National Monument, an increasingly popular national monument supported by a robust and active group of volunteers and land managers. A new visitor kiosk was recently installed at IFNM at the Agua Blanca portal and the annual "Meet the Monument" event grows every year, with increasing numbers of participants every year. Building a freeway next to these protected public lands would cause irreparable harm to a place that is gaining momentum and actively investing in the visitor experience.

On April 17, 2019, local newspaper the AZ Daily Star reported on a recent U.S. News and World Report article that identified the Arizona-Sonora Desert Museum as one of the best 30 zoos nationwide. The Recommended Alternative route is located within approximately a half-mile of the Arizona-Sonora Desert Museum. Construction of this route would cause increased noise, light, and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of the viewshed at the museum. None of these impacts can be adequately mitigated.

The Recommended Alternative route would also drive traffic AWAY from Tucson's downtown and growing business districts that rely on traffic from I-19 and I-10 to survive. The City of Tucson resolution adopted unanimously by the Mayor and Council on June 19, 2019 clearly states opposition to the Recommended Alternative route and includes the following statements:

"...Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods.

...Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination.

...In April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district.

...Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics.

...Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations.

...[The] cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson.

...[The] state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions - by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic."

These are all economic arguments for either the No Build alternative or co-locating I-11 with I-19 and I-10 and demonstrate the grave economic consequences to the City of Tucson from the Recommended Alternative route. It is impossible to mitigate for these impacts to Tucson's economy and water supply.

Last, the DEIS needs to improve its analysis of the far-reaching impacts to local governments from building a brand-new freeway in a currently rural area. The Recommended Alternative route would lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other infrastructure and services, the cost of which would likely be borne by local governments such as the City of Tucson, Town of Marana, and Pima County.

Cost of considered alternatives

Our interpretation of the cost of considered alternatives in the DEIS indicates that the Recommended Alternative route would cost approximately \$3.4 billion MORE to construct than the Orange Alternative that co-locates I-11 with I-19 and I-10 in the Tucson region. This estimate is based on information in Table 2-8 on page 2-33 of the DEIS. For Section A-F2, the Green Build Alternative construction costs are estimated to be \$3,998,431,000 and the Orange Build Alternative construction costs are estimated to be \$585,899,000. This leads to the conclusion that it will cost approximately \$3.4 billion more to construct the Green Build Alternative. **We are also unclear why the DEIS does not clearly outline the costs of the Recommended Alternative route (blue on maps), rather leaving it up to the reader to somehow interpret the costs from the other identified routes and where they overlap with**

the Recommended Alternative route. The public should be given clear information for comparison and not be left to make unsure inferences from the incomplete data presented.

One other example of where the DEIS states the costs of considered alternatives in a confusing and incomplete way is in the following section:

Errata 4.5.3

Tunneling – Placing portions of the proposed Project in a tunnel was considered in the property-specific avoidance analysis (Section 4.4.3) as a means to avoid potential impacts to clusters of properties and Historic Districts. FHWA determined that tunneling could result in a use of one or more Section 4(f) properties and, therefore, is not an avoidance alternative. However, even if a way of avoiding use of Section 4(f) properties were to be found, the cost estimate for placing I-11 in a tunnel in Downtown Tucson is approximately \$3.5 to \$5.1 billion, compared to \$240 million for the at-grade concept and \$1 billion for the elevated concept. The extraordinary cost for tunneling indicates that, while tunneling may be feasible, it is not prudent (Avoidance Analysis Factor 4). Elevated Structures – Elevating I-11 in Downtown Tucson to avoid impacting Section 4(f) properties was considered in the property-specific avoidance analysis (Section 4.4.3.2 and 4.4.3.3). Although the elevated lanes could avoid direct impacts on adjacent Section 4(f) properties, noise and visual impacts would result in adverse effects to historic buildings and structures. Deep excavations for the elevated structure foundations would impact archaeological resources. For these reasons, an elevated lanes alternative through Downtown Tucson is not an avoidance alternative. The elevated alternative also would impact businesses and residences that are not protected by Section 4(f) and would add \$1 billion to the overall capital cost of the Orange Alternative.

It is unclear what specifically the “\$240 million” is referring to in terms of the specific section of highway considered for an at-grade concept. It should also be noted that even though \$1 billion was added to the Orange Alternative in order to elevate I-11 through downtown Tucson, the capital costs would still be \$2.4 billion LESS than the Recommended Alternative route.

In general, we are disappointed with the presentation of the cost of considered alternatives - they are difficult to interpret and should be more clearly and conclusively discussed so compared costs of alternatives are clear to the reader. The examples highlighted above are not exhaustive by any means and we recommend a thorough overhauling of this entire section of the DEIS.

Inadequate 4(F) analysis

The comparison between impacts to the Tucson Mitigation Corridor (TMC) and impacts to the seven historic properties likely to be used if the Orange Alternative is chosen are inadequate as presented in the DEIS.

Use of programmatic “net benefit” evaluation for TMC is inappropriate

Conducting a “net benefit” programmatic evaluation of the proposed use of the TMC is completely inappropriate for this 4(f) property. First, the federal regulations that govern 4(f)

evaluations make clear that the use of programmatic evaluations like the “net benefit” evaluation are to be used only “for certain minor uses of Section 4(f) property.” (23 CFR 774.3(d)) Additionally, per agency guidance, the “net benefit” must be realized on the 4(f) property itself; promising off-site mitigation to offset impacts to a 4(f) property is not the same thing. According to FHWA guidance, a “‘net benefit’ is achieved when the transportation use, the measures to minimize harm, and the mitigation incorporated into the project results in an overall enhancement of the Section 4(f) property... A project does not achieve a “net benefit” if it will result in a substantial diminishment of the function or value that made the property eligible for Section 4(f) protection.”⁹

There is simply no way to achieve a “net benefit” on this 4(f) property, as the use proposed here will, without a doubt, diminish - if not entirely undermine - the ability of the TMC to provide landscape connectivity for wildlife movement. This is especially true considering that this property is itself serving as mitigation for a previous linear project that impacted landscape connectivity in this same area. Regardless of the off-site mitigation promised, it is unlikely that this property will be able to continue to serve as mitigation for that previous project, should this proposed use be approved. **For these reasons, the use of the “net benefit” evaluation for the TMC is simply indefensible. The agencies should conduct an individual evaluation on the TMC property and revise the entire *Draft Preliminary Section 4(f) Evaluation* to consider that individual evaluation.**

Assessment of 4(f) property uses relies on inconsistent information

Because the agencies relied on the incorrect assumption that a “net benefit” would be achieved for the TMC 4(f) property, the DEIS provides no information whatsoever on the actual impacts that may be inflicted on the TMC. No baseline information on the TMC is provided and no information on potential impacts is provided. Without this information, there is no way for the reader to understand what a “net benefit” even means in this context; thus, it is inappropriate to leave this information out. However, because net benefit is inappropriate, it is imperative that the EIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

For example, Google imagery does not provide adequate information for assessing historic integrity and architectural significance for numerous reasons, and there are other far more valid approaches to evaluating such properties that the agencies could have used instead. Acknowledging one of the many pitfalls of this approach, the DEIS admits that “many [properties] were classified as possibly eligible simply because the Google imagery did not provide a clear view.”

In addition, the DEIS is inconsistent in analyzing the costs and feasibility of tunneling through downtown Tucson but does not include a similar analysis of the costs and feasibility of tunneling under the entire 4(f) Tucson Mitigation Corridor.

⁹ “Section 4(f) Evaluation and Approval for Transportation Projects that Have a Net Benefit to a Section 4(f) Property.” Federal Highway Administration Environmental Review Toolkit.
https://www.environment.fhwa.dot.gov/legislation/section4f/4f_netbenefits.aspx.

The DEIS is inconsistent in how it presents information related to the assessment of 4(f) properties. One example of this can be found in a comparison of how information regarding the TMC is represented versus how information regarding the downtown Tucson historic properties is represented. While it is technically true that 15% of the TMC acreage would be within the build corridor (453 out of 2958 acres), far more than just 15% would actually be impacted, considering the purpose for which the TMC was designated (providing landscape connectivity for wildlife movement). In contrast, the EIS asserts that 100% (3 of 3 acres) of the Manning House would be “used;” however, the document goes on to say, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” (EIS at 3.7-24.) Therefore, while 100% of this historic property would be within the corridor, the EIS makes clear that the impact is not 100%. However, with the TMC no parallel consideration of actual impacts is given.

Reliance on insufficient information to compare each Alternative’s potential use of 4(f) properties.

Agencies are required to “identify any methodologies used and shall make explicit reference... to the scientific and other sources relied upon for conclusions in the statement.” (40 CFR 1502.24.) It has long been established that agencies must articulate “a rational connection between the facts found and the choice made.” *Motor Vehicle Mfrs. Ass’n of the U.S. v. State Farm Mut. Auto Ins. Co.*, 463 U.S. 29, 43 (1983).

The flaws resulting from the “net benefit” assumption for TMC aside, the validity of some of the information used to inform the comparison of 4(f) properties is extremely questionable. The information provided for each property is insufficient, in some cases contradictory, and is undermined by inadequate, contradictory information about the properties being compared, and using different metrics.

Scope and Intensity of Impacts to 4(f) properties potentially impacted by Orange Alternative are artificially inflated, while no corollary information is provided for the 4(f) property potentially impacted by the Purple and Green Alternatives.

The DEIS’s comparison of the number of 4(f) properties and their potential use under each alternative is confounding to the reader, precluding meaningful analysis.

Table 4-4 provides the percentage of each 4(f) property located within a build corridor for the various alternatives. However, this information seems to contradict information in the text, causing confusion regarding how potential use of each property is being assessed. This results in a significantly problematic apples-to-oranges comparison of the potential use of each property that tells the reader virtually nothing about the actual potential use of each 4(f) property.

For example, the potential use of the Manning House in downtown Tucson is unclear. First, the property description is inconsistent from one section to the next; on table 4-4 it is described as 1 acre in size, but on table 4-4 it is described as 3 acres in size. Second, Table 4-4 estimates that 100% of the property is subject to “potential use,” but in the text on page 3.7-24 the DEIS

states, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” This indicates that the percentage of “potential use” is not the same as the percentage of the property potentially directly impacted, indicating that indirect impacts are part of the “potential use” consideration. Another example of this is Barrio Anita, where the percentage of the property subject to “potential use” is 85 percent. At the same time, the text states that out of 66 buildings identified in the Barrio Anita Historic District NRHP nomination, the Orange Alternative “could require land from four parcels with contributing residences along the west side of Contzen Avenue but not all of those houses might be directly affected” (EIS at 3.7-24). To make matters more confusing, elsewhere the text states, “The Orange Alternative could require... Removal of at least one historic residential structure adjacent to I-10 in Barrio Anita” (page 4-75). Again, the only explanation for the discrepancy between the percentage of potential use and the amount of land potentially directly impacted is that indirect impacts are considered in the percentage of potential use.

In contrast, the potential use of the TMC property does not appear to include indirect impacts. Table 4-4 shows that only 15% of the property is subject to potential use, with only the percentage of land directly impacted. However, the percentage of potential use would be far larger if indirect impacts are considered for this property, considering how severely compromised the TMC would be as a wildlife movement corridor if an interstate is routed along its entire western boundary or diagonally, from southeast to northwest, through the parcel. There is no explanation for why the TMC is not given the same consideration as the 4(f) properties it is being compared against.

Other discrepancies abound. Page 4-73 provides a list of seven 4(f) properties in downtown Tucson that are subject to potential use by the Orange Alternative, which includes the Barrio Anita Historic District and the David G. Herrera and Ramon Quiroz Park (formerly Oury Park). The analysis uses this number to compare the Orange Alternative’s potential impacts to 4(f) properties to those of the Purple and Green Alternatives, where only one property -- the TMC -- is subject to potential use. However, the text makes clear that Quiroz Park is a contributing property to the Barrio Anita Historic District, and the Park is not listed separately on Table 4-2 or Table 4-4. Inadvertently or otherwise, listing Quiroz Park separately only in this context artificially increases the number of properties potentially impacted by the Orange Alternative and skews the comparison with the Purple and Green Alternatives.

Information provided in Least Harm Analysis is so inadequate it precludes meaningful analysis

Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property

When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, “There is a low ability to mitigate the impacts of the Orange Alternative.”

In addition, on page 4-108 the DEIS states, “After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable...” Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation.

On page 4-96, the DEIS states, “As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property.” This statement explicitly demonstrates skewing of the comparison.

Least harm analysis Factor 3: Relative significance of each Section 4(f) property

The DEIS asserts the following on page 4-97, “FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value.” We strongly disagree with this outlandish statement and urge further evaluation of all Section 4(f) properties. This statement asserts that the entire Tucson Mitigation Corridor is equal to the parking lot of the Manning House, which is a ridiculous and erroneous assertion to make.

Least harm analysis Factor 6

Section 4(f) properties are defined in part as “*publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site).*” The Ironwood Forest National Monument was designated by Presidential Proclamation in June of 2000, under a new protective classification of federal Bureau of Land Management lands. We disagree with the conclusion in the DEIS (Appendix F) that fails to recognize Ironwood Forest National Monument as a Section 4(f) property.

Furthermore, the DEIS fails to consider the magnitude of adverse impacts on multiple properties not protected by Section 4(f). For example, for the Purple and Green Alternatives, this analysis must include the Ironwood Forest National Monument (see above), Tucson Mountain Wildlife Area, and Sonoran Desert National Monument. We believe these properties should be considered as 4(f) properties. However, even though these properties are not considered 4(f) properties, this does not mean there are no adverse impacts to them.

Consideration of other transportation strategies

The DEIS and the choice of the Recommended Alternative route overlooks other less costly options that would encourage the free flow of goods through our region. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;

- Technologies that improve traffic flows;
- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

During the Scoping phase, we strongly recommended a more thorough analysis and consideration of these other transportation strategies that will also better equip our region to adapt to the growing impacts of climate change. Assessing the cumulative impacts of these options on congestion also needs to be more thoroughly considered in the DEIS. **We reiterate our request for this more thorough analysis in future planning efforts and this analysis be completed and shared with the public prior to designating a Preferred Alternative.**

Additional necessary studies

The following studies must be completed prior to designating a Preferred Alternative, with the results communicated to the community and incorporated into the decision process early on:

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the Recommended Alternative route. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Brawley/Los Robles wash system and Santa Cruz River.
- Social and economic equity impacts.

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any Recommended Alternative route. Furthermore, we strongly encourage ADOT and FHWA to refer to the “I-11 Super Corridor Study” final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and the University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Using such studies and designs would help us reduce impacts in Tucson's downtown and surrounding areas should co-location be further considered.

Other factors that must be more thoroughly analyzed for all corridor alternatives include how continued climate change, which is a reasonably foreseeable circumstance, will impact Arizona's water resources and projected population growth; public health implications,

including increased air pollution and the proliferation of valley fever; and long-term impacts on local and regional land-use plans.

The Recommended Alternative route through Avra Valley would facilitate commercial and residential development in this area. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.

Considering the identified Recommended Alternative route in the DEIS, we argue that either the No Build alternative or improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental and larger community impacts. **Because of this, we stand in strong opposition to the Recommended Alternative route.**

Local government opposition

In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 (attached) opposing “the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.” Additionally, the Board called for the expansion of “capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.”

Additionally, in April 2019 Pima County Board of Supervisors’ Chair Richard Elías and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, “The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through ‘invaluable Sonoran Desert areas.’ That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it” (attached). We strongly concur with Pima County’s elected officials and their resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, “The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction

of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately mitigated and that are contrary to the interstate design standards and criteria that must be applied to the project.”

On May 18, 2019, Arizona District 3 Congressman Raúl Grijalva submitted comments on the DEIS voicing his opposition to the Recommended Alternative route. We have attached the Congressman’s letter as well.

Thank you for the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. **Given the far-reaching and devastating impacts that the Recommended Alternative route would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, we express our strong opposition to the Recommended Alternative route and feel that should additional capacity be warranted, that reconfiguration of existing highways is the only acceptable Alternative. This DEIS is replete with inadequate analyses and is, in and of itself, a fatal flaw.** We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jodi Netzer, Director
Tucson Entrepreneurs

Robin Clark *for*
Avra Valley Coalition

Tom Hannagan, President
Friends of Ironwood Forest

Louise Misztal, Executive Director
Sky Island Alliance

Barbara Rose, Project Coordinator
Safford Peak Watershed Education Team

Diana Hadley, Co-President
Northern Jaguar Project

Demion Clinco, President
Tucson Historic Preservation Foundation

Sandy Bahr, Chapter Director
Sierra Club - Grand Canyon Chapter

Meg Weesner, Chair
Sierra Club - Rincon Group

Emily Yetman, Executive Director
Living Streets Alliance

Kevin Gaither-Banchoff, Development
Director
WildEarth Guardians

Peter Chesson, President
Tucson Mountains Association

Gayle Hartmann, President
Save the Scenic Santa Ritas

Robert Villa, President
Tucson Herpetological Society

Terry Majewski, Chair
Tucson-Pima Historical Commission

Ivy Schwartz, President
Community Water Coalition of Southern
Arizona

Jonathan Lutz, Executive Director
Tucson Audubon Society

Nancy Williams, President
People for Land and Neighborhoods

Fred Stula, Executive Director
Friends of Saguaro National Park

Pearl Mast and Anna Lands, Co-Chairs
Conservation Committee
Cascabel Conservation Association

Randy Serraglio, Southwest Conservation
Advocate
Center for Biological Diversity

Myles Traphagen, Borderlands Project
Coordinator
Wildlands Network

Gary Kordosky, President
Gates Pass Area Neighborhood Association

Della Grove, President
Citizens for Picture Rocks

Jessica Moreno, President
Arizona Chapter of The Wildlife Society

Mike Quigley, Arizona State Director
The Wilderness Society

Robert Peters, Southwest Representative
Defenders of Wildlife

Attachments: April 2019 Memo from Pima County Supervisors Richard Elías and Sharon
Bronson
Pima County Resolution No. 2007-343
City of Tucson Resolution No. 23051
May 2019 Letter from Rep. Raúl Grijalva (D-AZ)

ATTACHMENTS

April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson



PIMA COUNTY BOARD OF SUPERVISORS

130 WEST CONGRESS STREET, 11th FLOOR
TUCSON, ARIZONA 85701-1317

(520) 724-8126
district5@pima.gov
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To Whom it May Concern:

The Pima County Board of Supervisors adopted Resolution No. 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through "invaluable Sonoran Desert areas." That remains the official position of Pima County government.

At the time, the proposal under consideration was for an Interstate 10 Bypass Freeway, but it was along the same suggested routes as the currently proposed Interstate 11. A "favored" route then, as now, was through Avra Valley.

A freeway through the Avra Valley or other parts of the delicate Sonoran Desert is not compatible with the county's landmark Sonoran Desert Conservation Plan or with its Sustainability Plan to combat climate change in line with the 2015 Paris Agreement.

A freeway would destroy sensitive habitat for many of the 44 unique species of concern that the Conservation Plan protects. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn.

The Sustainability Plan aims to steer the county government operations away from fossil fuel use and dependency, and a new freeway would promote increased fossil-fuel use, to the detriment of our air quality as well as to climate change.

A freeway through Avra Valley would impact severely and negatively such jewels and tourist areas as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Arizona-Sonora Desert Museum. It would diminish vastly the quality of life of thousands of Avra Valley residents.

The cost of buying land for and building an entirely new freeway would be tremendous, when we do not have enough funds to maintain properly our existing roads and highways. It would cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

An Interstate 11 would divert traffic away from existing businesses that depend on Interstate 10 and Interstate 19 traffic visibility for their survival.

A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it.

Sincerely,

Richard Elías, Chairman
Pima County Board of Supervisors

Sharon Bronson, District Three Supervisor
Pima County Board of Supervisors

RESOLUTION NO. 2007- 343**A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS IN
OPPOSITION TO CONSTRUCTION OF AN INTERSTATE HIGHWAY LINK
THAT BYPASSES TUCSON AND TRAVERSES PRISTINE AND INVALUABLE
SONORAN DESERT AREAS**

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

WHEREAS, Pima County has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel to this effort because of their greenhouse-gas and pollutant emissions, and therefore calls for the County to shift its fleet to use alternative fuels; and

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new controlled-access highway would be enormous, requiring the acquisition of thousands of acres of new rights of way, expenditures on high and rapidly increasing costs of concrete and asphalt, putting a tremendous burden on taxpayers and future highway users; and

WHEREAS, the production of the millions of tons of concrete and asphalt for this massive construction project would cause significant air pollution and greenhouse gas emissions, as would the operation of heavy machinery in the construction process; and

WHEREAS, a new controlled-access highway near or through Pima County on any route, would promote urban sprawl, causing local governments to incur large financial responsibilities for new infrastructure costs and force major changes to existing county land-use and zoning designations; and

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; and

WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

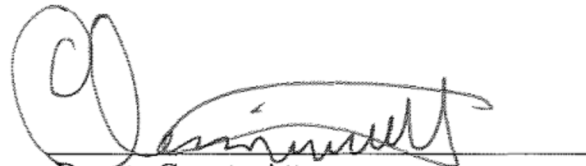
2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.


Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:


Clerk of the Board
Deputy County Attorney

ADOPTED BY THE
MAYOR AND COUNCILJune 18, 2019RESOLUTION NO. 23051

RELATING TO PUBLIC HEALTH AND SAFETY: DECLARING MAYOR AND COUNCIL'S OPPOSITION TO CONSTRUCTION OF A NEW INTERSTATE HIGHWAY THAT BYPASSES THE CITY OF TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS; AND DECLARING AN EMERGENCY.

WHEREAS, the City of Tucson (Tucson) works to advance goals of sustainability, equity, economic growth and vibrant, livable neighborhoods; and

WHEREAS, in November 2013 Tucson voters adopted Plan Tucson, the City of Tucson General Plan & Sustainability Plan; and

WHEREAS, Tucson has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel because of their greenhouse-gas and pollutant emissions; and

WHEREAS, Plan Tucson seeks to create, preserve, and manage biologically rich, connected open space; wildlife and plant habitat; and wildlife corridors, including natural washes and pockets of native vegetation, while working to eradicate invasive species; and

WHEREAS, an interstate highway in the Avra Valley would degrade the Sonoran Desert, sever wildlife corridors, impede washes and flood prone areas, open new areas to intense residential and commercial development

far from existing urban centers, and encourage more car and truck travel at time when climate change and air pollution are growing concerns; and

WHEREAS, Tucson strives to protect night skies from light; and

WHEREAS, Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods; and

WHEREAS, Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination; and

WHEREAS, in April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district; and

WHEREAS, Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics; and

WHEREAS, Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations; and

WHEREAS, the Interstate 11 Draft Tier 1 Environmental Impact Statement Recommended Alternative route would run through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park - West, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona

Project mitigation parcel, and severing linkages between important habitat areas and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson; and

WHEREAS the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions – by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately

mitigated and that are contrary to the interstate design standards and criteria that must be applied to this project.

SECTION 2. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City of Tucson that this Resolution become immediately effective, an emergency is hereby declared to exist and this Resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Tucson, Arizona, June 18, 2019.

MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM:

REVIEWED BY:



JCP CITY ATTORNEY

CITY MANAGER

MR/dg
6/13/19

COMMITTEE ON NATURAL RESOURCES
CHAIRMAN

COMMITTEE ON EDUCATION AND LABOR
HIGHER EDUCATION AND WORKFORCE INVESTMENT
SUBCOMMITTEE

CIVIL RIGHTS AND HUMAN SERVICES SUBCOMMITTEE

CONGRESSIONAL PROGRESSIVE CAUCUS
CHAIR EMERITUS

Congress of the United States
House of Representatives
Washington, DC 20515-0307

WEBSITE: <http://grijalva.house.gov/>

May 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

Also emailed to: I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Dear Mr. Van Echo,

I would like to take this opportunity to provide input during the public comment period on the Draft Tier 1 EIS referenced above.

I am concerned that the current comment period is too short for a comprehensive review of this extremely large document (762 pages plus appendices). I request that the comment period be extended for a total of 120 days—which is common for projects of this magnitude and controversy—making the revised due date for comments August 3, 2019.

I support efforts to physically connect Arizona and Nevada via transportation corridors to facilitate Canadian and Mexican trade routes. The City of Tucson and the metro region of Pima County would benefit most by enhancing existing infrastructure that already provides the connection: Interstate 10 and 19, or option “A” and “B” that have been included in your route studies.

I am **very concerned** that a hybrid option of routes going through Altar and Avra Valley has instead been chosen for the preferred alternative in the Draft Tier 1 EIS. This route would necessitate building new interstate. This route would negatively impact rural communities in Avra Valley, Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and other protected open spaces and wildlife corridors. I pointed this out during the scoping process in a June 1, 2017, letter to project manager Jan Van Echo. For the record I would like to repeat my concerns:

This proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values, and quality of life for residents of that community. Even a limited access roadway would still open this mainly undeveloped area to massive sprawl. Residents of my district affected by this option have called my office expressing these same concerns. Pima County voters have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, the Federal Highway Administration and the Arizona Department of Transportation must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concerns expressed

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TWITTER: [Twitter.com/RepRaulGrijalva](https://twitter.com/RepRaulGrijalva)
INSTAGRAM: [Instagram.com/RepRaulGrijalva](https://www.instagram.com/RepRaulGrijalva)

all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

One explanation for this conclusion is that a Tier 1 analysis is not enough for a federal process to come up with the better route alternative. The tiering of the required environmental compliance means that the decision is not informed by the best information and that vague promises of future mitigation is enough to allow the incredible decision to bisect an important wildlife mitigation area with a major freeway. This calls into question the Department of Transportation's unusual practice of coming to a decision without the full environmental compliance that most other federal projects regularly require.

A proposed MOU giving the state environmental compliance responsibilities for federal highway projects in Arizona, which would include the Tier 2 study, further demonstrates the inappropriate fragmentation of planning and compliance this project will receive, especially compared to projects with this sort of impact on protected lands that our community would normally expect.

Another issue of concern is the regularity with which this route keeps re-surfacing. Voters overwhelmingly voted against a ½ cent sales tax that would have funded a similar project back in the mid-1980s. The Picture Rocks community along with many other Pima Country residents and organizations have and continue to vocally oppose it, yet this route keeps being promoted as the preferred option.

Very little is being done to address alternatives to continuous freeway expansion, such as facilitating the expansion and use of intermodal shipping yards, facilitating the creation of public rail transportation lines as alternatives to continuously promoting freeway development—especially in pristine habitat corridor areas. I consistently remain opposed to any highway plan that opens up the Avra valley to widespread environmental destruction.

The possible fast tracking of this project, despite information typically disseminated by the project's managers at public meetings that there is not current funding available, is concerning. While that may be currently true, this project is in conjunction with the Federal Highway Administration, I-11 and Intermountain West Corridor Study (IWCS) completed in 2014. With talk in Congress about developing an infrastructure spending package, the state appears to be attempting to remove all barriers to fast tracking this project once, and if, funding is available. If Congress is able to pass an infrastructure package, the voters will have no say, as planning will be completed, and routes will have been previously selected.

If the project's purpose is to provide a high-priority north to south transportation corridor to connect to major metropolitan areas and markets with Mexico and Canada, then I believe that the best option is using Interstate 10 and 19, which already includes metropolitan Tucson and protects the environmentally sensitive area west of Tucson.

Thank you for your time and the opportunity to provide input.

Sincerely,



Raúl M. Grijalva,
Member of Congress, (AZ-03)

Cc: Jan Van Echo, PE, ADOT I-11 Study Manager

Felicia Chew Community Projects
917 E Pastime Road
Tucson, AZ 85719
Feliciachew19@gmail.com
www.feliciachew.com

July 8, 2019

To whom it may concern:

With great power comes great responsibility.

I am writing to oppose the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11. This route is located west of Tucson and bypasses Tucson through rural Altar and Avra Valleys, a landscape bordered by treasured and protected public lands and iconic tourist attractions that will be irreparably harmed by a nearby freeway for many reasons, including the following:

- The Recommended Alternative route would damage both natural resources and degrade the visitor experience at a wide array of public lands, especially those located in the Tucson Mountains. No mitigation could offset these negative impacts.
- Building a freeway through Bureau of Reclamation mitigation lands would violate the purpose for which these lands were set aside. It is impossible to adequately mitigate for the impacts from a federal freeway to lands that already mitigate for another federal project, the Central Arizona Project canal.
- The Recommended Alternative route would sever critical wildlife corridors. This fragmentation would destroy the ability of wildlife species such as desert bighorn sheep to disperse, roam, find new mates, and expand their home ranges.
- The Recommended Alternative route would cost \$3.4 billion more to build than co-locating I-11 with I-19 and I-10 through Tucson.
- Downtown Tucson and economic powerhouses such as the Arizona-Sonora Desert Museum and Saguaro National Park would see reduced revenue and negative economic impacts.
- The Recommended Alternative route would cause significant noise, air, and light pollution, encourage urban sprawl, and destroy the rural character of the Altar and Avra Valleys.
- Lands and wildlife habitat that would be severely impacted by the Recommended Alternative route include mitigation lands for Pima County's Section 10 Habitat Conservation Plan, a part of the nationally-recognized Sonoran Desert Conservation Plan.
- The City of Tucson has voiced opposition to this route as it places a freeway adjacent to the City's major water supply. We cannot guard against a toxic spill that would threaten Tucson's most vital resource.

Additionally, the construction of the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11 impacts public lands.

The Recommended Alternative route is located perilously close to a wide array of public lands, including:

- o Federal lands: Saguaro National Park West, Ironwood Forest National Monument, and the Tucson Mitigation Corridor (owned by the Bureau of Reclamation and managed by Pima County). In the case of Saguaro National Park West, the route comes within 1,300 feet of the park boundary. In the case of Ironwood Forest National Monument, the route comes within 400 feet of the monument boundaries in multiple locations.
- o County lands: Tucson Mountain Park and open space properties purchased and protected under Pima County's Sonoran Desert Conservation Plan and Section 10 Habitat Conservation Plan.
- o Tribal lands owned by the Pascua Yaqui Tribe and the Tohono O'odham Nation.

The construction of the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11 impacts wildlife corridors.

The Recommended Alternative route:

- Severs important wildlife corridors between the Tucson Mountains and Ironwood Forest National Monument and the Waterman Mountains.
- Directly crosses through the Tucson Wildlife Mitigation Corridor that was created as mitigation for impacts to wildlife corridors by the construction of the Central Arizona Project canal.
- In 2016, two desert bighorn sheep rams were photographed in numerous locations in the Tucson Mountains. It is highly likely that these rams used existing wildlife corridors between Ironwood Forest National Monument (where a herd of desert bighorn sheep exists) and the Tucson Mountains to travel to the southern section of the Tucson Mountains. These wildlife corridors would be fractured and fragmented forever by a new freeway.

The construction of the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11 also results in noise, air, and light pollution.

The Recommended Alternative route would:

- Cause significant noise, air, and light pollution, negatively impacting a wide variety of public and private lands, including a protected wilderness area in Saguaro National Park.
- Exponentially encourage urban sprawl west of the Tucson Mountains, destroying the rural character of this area.
- Negatively impact scientific research at Kitt Peak Observatory by increasing night lighting and compromising the ability of scientists to conduct their research.

The construction of the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11 negatively impacts our economy.

The Recommended Alternative route from the border to Casa Grande would:

- Cost \$3.4 billion more than co-locating I-11 with I-19 and I-10 through the Tucson region (according to page 2-33 in Chapter 2 of the DEIS, routes A/B/G of the Orange Route Alternative would cost ~\$586 million compared to routes A/D/F of the Green Route Alternative which would cost ~\$3.9 BILLION.).
- Cause economic loss to Tucson by diverting traffic away from Tucson's downtown and growing business districts.
- Lead to negative economic impacts to tourism powerhouses such as the Arizona-Sonoran Desert Museum and Saguaro National Park West, among many others.
- Lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other services.

Furthermore, the construction of the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11 negatively impacts private property.

The Recommended Alternative route would:

- Encroach on the private property rights of thousands of private property owners along its entire north-south length, lowering property values and destroying the rural character of lands in Avra Valley, Picture Rocks, and other areas in Pima County, along with areas to the north.

Thank you for taking my comments into consideration when making the decision regarding the construction of the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11 impacts public lands.

In summary, my small business and I say "No thank you" to the offer for a freeway through Avra Valley.

Respectfully,

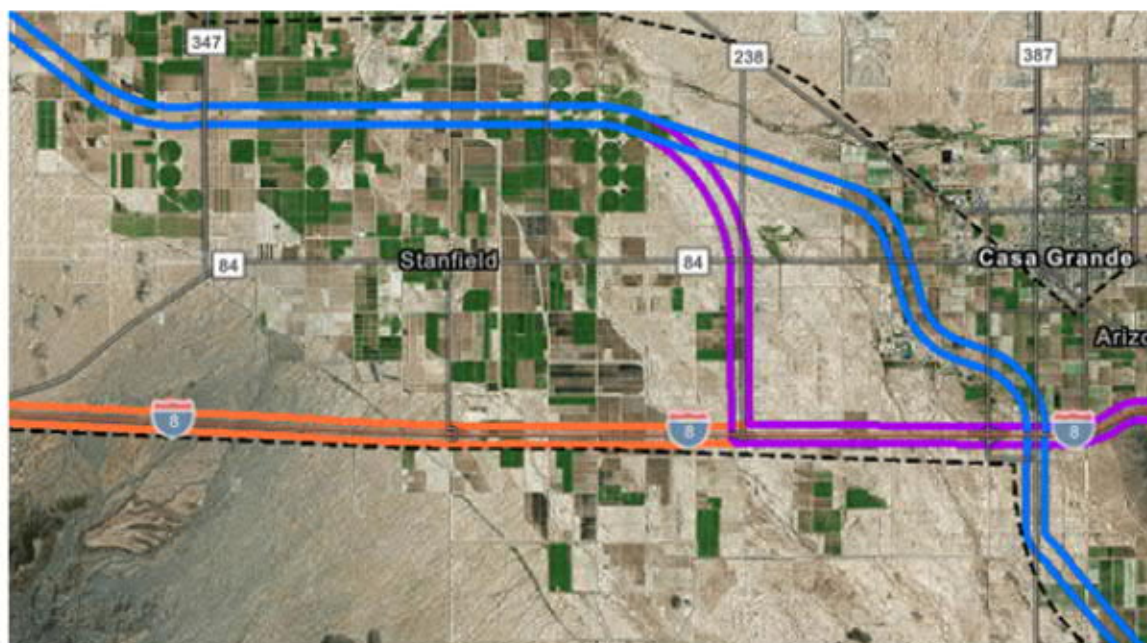
Felicia Chew
Resident and Small Business Owner
Felicia Chew Community Projects,
Pima County, District 3





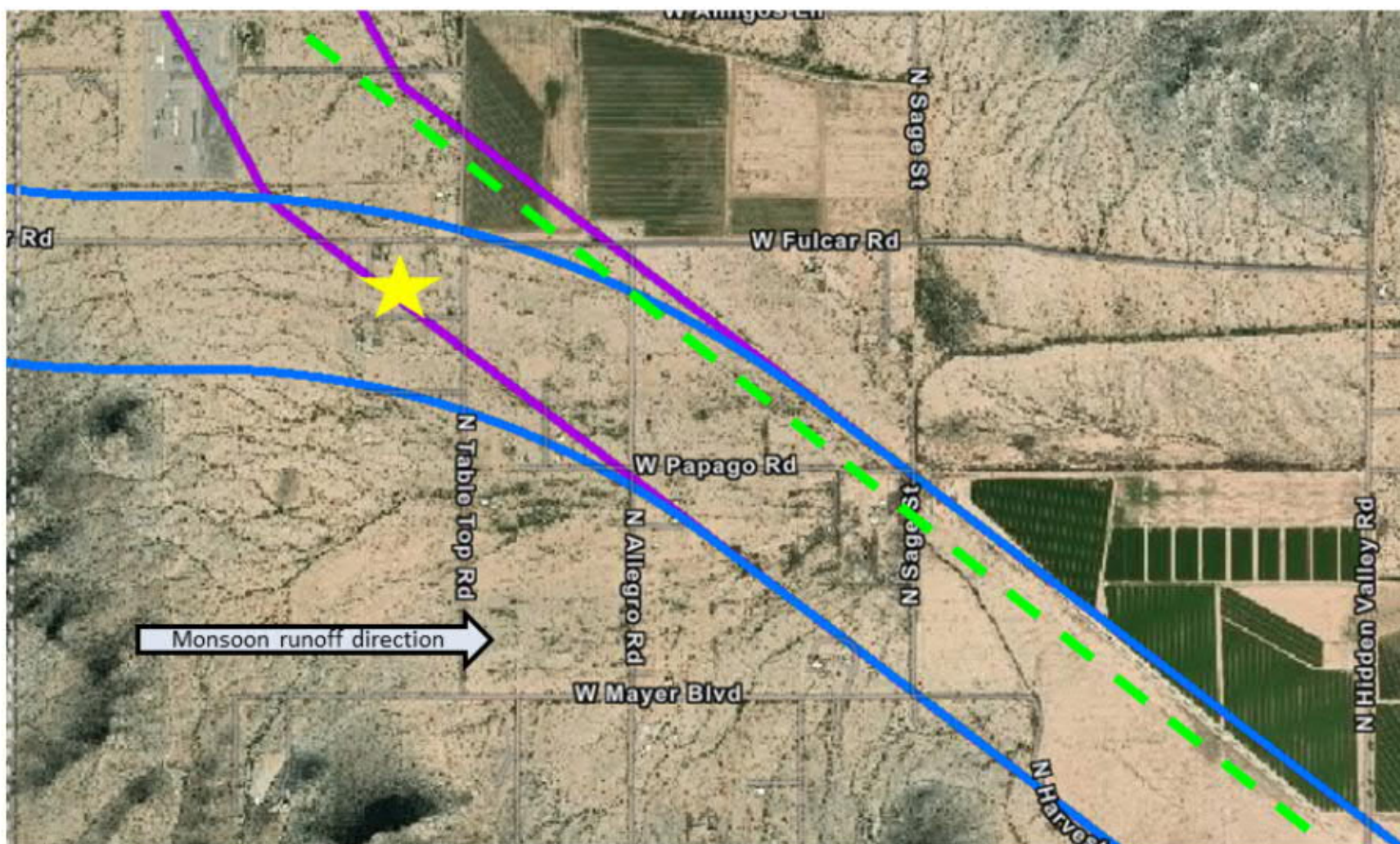
#1

Why destroy the
crop fields of
Allenville and
Palo Verde?
The more direct
route runs near
Arlington from
Hwy 85



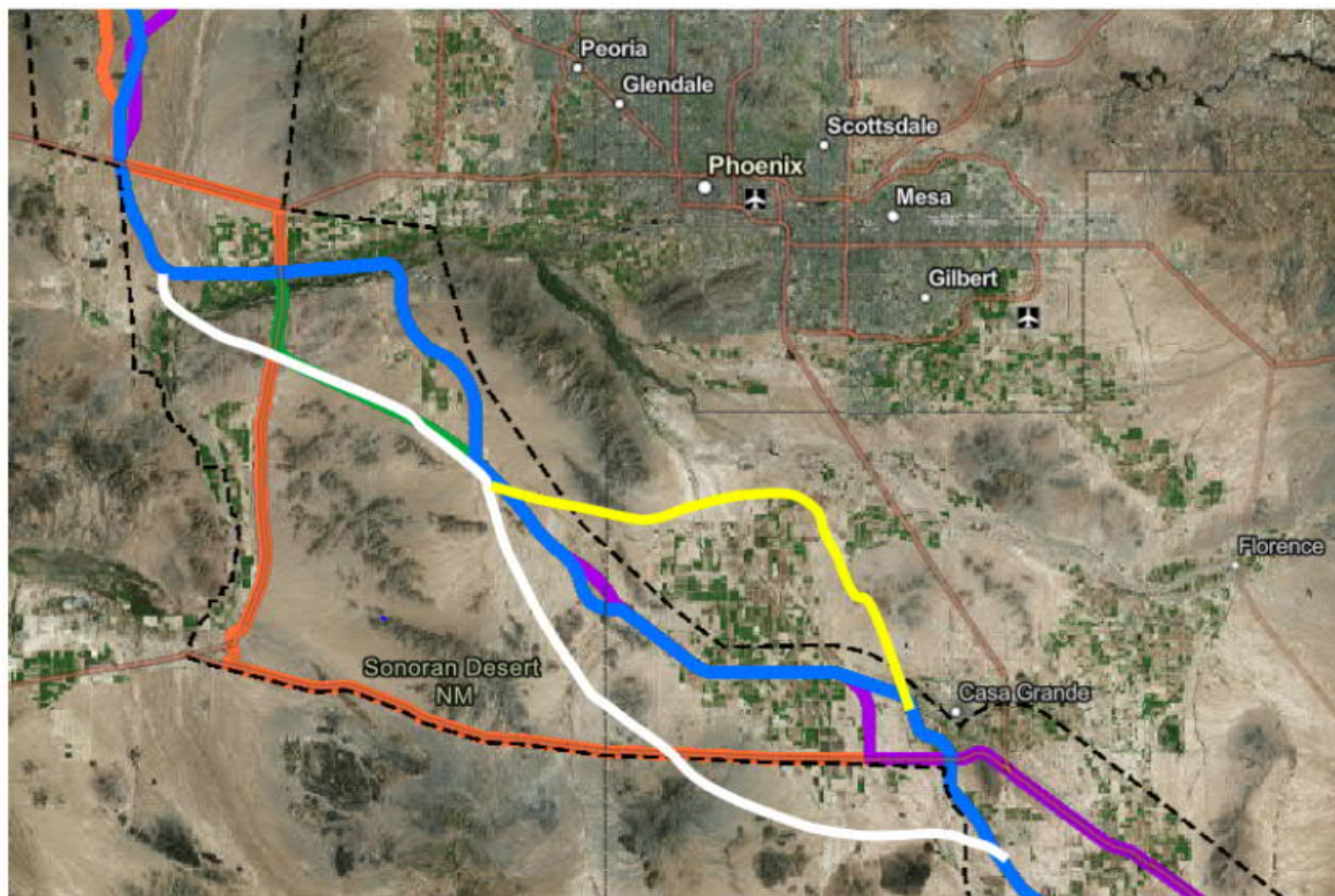
#2

Why destroy the
crop fields north
of Standfield?
The more direct
route runs East
of Hwy 347 from
Arizona City.



#3

Why destroy Residential neighborhoods and my home (at STAR)
High Pressure GAS line runs beneath blue route..green dotted line. UNSAFE ALTERNATIVE!
Suggest you reconsider using existing ORANGE DOT paths or reroute blue proposal.



Recommendation if ORANGE DOT paths are not used.
White is most direct from Arizona City to Mobile, across Hwy 85, and I-10 .
Yellow is better if both CG and Maricopa City need access to I-11

Now I've watch this happening for most of the time I've lived in the Marana zipcode. I am thankful that the 2016 election turned out the way it did or this fight would have come to a head sooner.

For my family we have already acquired property is Cochise County so I'll be OK but those who have to stay will still be abused as slaves of the city.

Here is my position:

STOP EXPLOITING AVRA VALLEY

WATER- Over 20,000 acres for water for Tucson that Avra Valley won't get. These lands, along with the closing of recreational shooting in Ironwood, have also created a clear path for illegal immigration and drug smuggling. The latest tactic in that assault may have reduced the use of this path but it remains in place.

LANDFILLS- The county has already given Avra Valley 2 of those.

SOLAR POWER- TEP built a solar farm in Trico service area. This facility has increased the flooding of Avra Valley Road (easily documented by review of historical aerial photos).

COMMERCE- No grocery store in Avra Valley. They ran off Curves from Picture Rocks and they let Family Dollar and Dollar General in. What officials benefited from that?

WILDLIFE – The planners and purveyors of I-11 purposely ran off the birds of prey from the route they decided on years ago by cutting down the historic nesting sites that were not in any way a peril to public safety so the impact could be down played in the report.

I am commenting on the I-11 Draft Tier 1 Environmental Impact Statement for Tucson.

Why this is a good idea, is way beyond me! Never mind ADOT would be regulating itself!

This interstate will have a huge impact on our wildlife and protected areas. Wildlife corridors will be blocked. This also impacts noise levels, protected areas, and light pollution for Kitt Peak. The road will be adjacent to Tucson Mountain Park, within 1300 feet of our beautiful Saguaro National Park west, 500 feet from Ironwood National Monument!

It would be an economic disaster for Tucson & Pima County, with lost revenue within the city, by having transportation going around our city. People will not stop off to eat, get gas, stay in our hotels, or visit our city.

The view from our beloved Arizona Sonoran Desert Museum will be destroyed. You will hear the traffic, see the cars, at night you will have the light pollution. Never mind gas station, hotels, fast-food restaurants & big box stores popping up in the horizon!!!

People will be forced off of their property.

Also, it will invite growth to Tucson, in an area that should be protected and already has a water shortage.

Emissions will be settling into the Central Arizona Projects water basin, threatening the aquifer.

By having the highway go around Tucson, it will economically impact the city; people will not be stopping in Tucson spending their monies.

Phoenix, will become a larger & more powerful city, while destroying Tucson financially and environmentally, with by-passing the city.

This is a horrible idea and should not be approved.

Cindy Clapp

8674 N Arnold Palmer Drive

Tucson, AZ 85742



Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 * sonorandesert.org

Arizona Center for Law in the Public Interest * Arizona Native Plant Society * Bat Conservation International * Cascabel Conservation Association * Center for Biological Diversity * Center for Environmental Ethics * Defenders of Wildlife * Desert Watch * Environmental Law Society * Friends of Cabeza Prieta * Friends of Ironwood Forest * Friends of Madera Canyon * Friends of Saguaro National Park * Friends of Tortolita * Gates Pass Area Neighborhood Association * Genius Loci Foundation * Native Seeds / SEARCH * Protect Land and Neighborhoods * Safford Peak Watershed Education Team * Save the Scenic Santa Ritas * Sierra Club – Grand Canyon Chapter * Sierra Club – Rincon Group * Sky Island Alliance * Society for Ecological Restoration * Southwestern Biological Institute * Tortolita Homeowners Association * Tucson Audubon Society * Tucson Herpetological Society * Tucson Mountains Association * Wildlands Network

July 4, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg*. We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection and the undersigned organizations.

Overview

In summary, we are in strong opposition to the Recommended Alternative route identified in the I-11 Tier 1 DEIS (“DEIS”). Our opposition is rooted in the major negative environmental and economic impacts that would inevitably occur if the Recommended Alternative route is successfully built and our belief that other transportation alternatives, including improving and expanding existing interstates, a focus on multi-modal solutions, and the inclusion of expanded rail service, could more effectively achieve the goals identified in the DEIS.

The Recommended Alternative route would have grave and devastating impacts to Pima County that cannot be adequately mitigated. These include:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation’s Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County’s Conservation Lands System.
- Impacts to planned mitigation lands for Pima County’s Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

- Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona's Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.
- Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water's CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- Impacts to Tucson's businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
- Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
- Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.

We believe that these impacts cannot be adequately mitigated.

Purpose and Need

First and foremost, we strongly believe that ADOT and FHWA have failed to clearly and thoroughly demonstrate the need for construction of an entirely new freeway, based on the best available science and data. ADOT and FHWA should analyze not only the most current transportation and growth models and current and projected traffic volumes, but also changing transportation modes. For example, if the Mariposa Point of Entry was fully staffed and operational 24 hours a day (which it currently is not), the currently required overnight parking would be reduced, spreading out traffic volumes throughout the day (and also decreasing air pollution since refrigerated trucks have to stay running all night long while they are parked), and negating the need for this proposal at all. Additionally, autonomous truck testing is currently occurring in southern Arizona, is expected to continue, and could safely accommodate truck traffic at night or in a designated lane.¹

The following planned projects should be analyzed by ADOT and FHWA:

- Plans to continue widening Interstate 10.

¹ <https://www.wired.com/story/embark-self-driving-truck-deliveries/>
https://tucson.com/business/pcc-tusimple-team-up-to-offer-self-driving-truck-operations/article_fb05bf3e-ba44-5dfd-ab23-dd6975cd509a.html

<https://www.tucsonweekly.com/tucson/hands-off-the-wheel/Content?oid=25111164>

- Elements of ADOT's 2017-2021 Five Year Plan to include, but not be limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.
- ADOT's 2011 "State Rail Plan," which was developed to address the needs of both freight and passengers.²

Also, of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of \$54 million secured in a highway grant for ADOT's I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation's competitive FASTLANE program. Tucson Mayor Rothschild said, "Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that's very good news for Tucson, Phoenix and the state as a whole."³

Concerns with the overall NEPA process

We have serious concerns about the larger NEPA process and the premature identification of a "Recommended Alternative" route without adequate scientific and economic analysis and environmental studies. We question the ability of the involved agencies to present thorough information to the public about the myriad impacts of the Recommended Alternative route, and other considered alternatives, given the inadequate analysis presented in the DEIS. **We fully support and incorporate by reference the full comments on the I-11 DEIS submitted by the National Parks Conservation Association in July 2019, including a more detailed analysis on this issue.**

Major Environmental Impacts from the Recommended Alternative Route

Impacts to Federal and Local Protected Areas

The Recommended Alternative route would have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the significant biological and cultural resources they contain. The Recommended Alternative route would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County's federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan, which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and *mitigation lands in Avra Valley are critical to its long-term success with special emphasis on riparian areas*. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014, and this HCP is currently under

² See: <https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0>. This rail plan was based off of this study completed in 2010: <https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0>

³ See <http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

review. Meanwhile, Tucson Water's operations in Avra Valley are planned and conducted as if the HCP is already in full effect. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are as important to consider as federal conservation lands in Pima County. Unfortunately, impacts to local conservation lands have not been adequately addressed and analyzed in the documents related to this process, including the DEIS. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their federal Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are in Avra Valley and directly in the path of the Recommended Alternative route. It is disappointing to see a total lack of acknowledgement of these important local conservation lands in the DEIS and in recent public presentations and materials - any review of environmental impacts should address impacts to local conservation lands in detail, particularly in light of the fact that these protections are a result of a federal Incidental Take Permit.

Impacts to Wildlife Linkages

The Recommended Alternative route would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.⁴

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the

⁴ Arizona Wildlife Linkages Assessment: <https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>

Pima County Wildlife Connectivity Assessment:
http://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf

isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, wildlife genetic health, and overall ecosystem resilience in this area.

Impacts to local wildlife linkages are not adequately addressed in the DEIS and adequate mitigation for impacts resulting from the Recommended Alternative route are not possible.

Impacts to Pima County's Conservation Lands System

The Recommended Alternative route would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. **We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS are not adequately addressed in the DEIS. The Recommended Alternative route would damage CLS mitigation lands to such an extent that the integrity of Pima County's federal ITP permit would be compromised. Again, adequate mitigation for these impacts is not possible.⁵**

Impacts to Riparian Habitat

The Recommended Alternative route would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest

⁵ Pima County's Conservation Lands System Map and Policies:

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf

The full text of the MSCP, Annual Reports, maps, and other important information can be found at:
<http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=52674>

More information on Pima County's Sonoran Desert Conservation Plan can be found at:
http://webcms.pima.gov/government/sustainability_and_conservation/conservation_science/the_sonoran_desert_conservation_plan/

region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

“Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state.”⁶

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS’s IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

The lack of consideration of the certainty of flooding in the Altar and Avra Valleys and the subsequent isolation of people and properties from public health and safety responders, not to mention the potential costly relocation of existing infrastructure for the CAP canal, Tucson Water, Marana Water and other regional water providers, numerous El Paso/Kinder Morgan boosting stations, and various electric utility substations is just one example of the flawed NEPA process. This woeful lack of analysis of social, cultural, scientific and economic impacts in the choice of an alternative without adequate due diligence is negligent and should be considered a fatal flaw. This DEIS puts the cart before the horse and would have dire consequences for the region.

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally “endangered” or “threatened,” those identified by the state of Arizona HabiMap (www.habimap.org) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima

⁶ http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf

County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

Aberts towhee
Bell's vireo
Western burrowing owl
Cactus ferruginous pygmy-owl
Western yellow-billed cuckoo
Swainson's hawk
Rufous-winged sparrow
Giant spotted whiptail
Tucson shovel-nosed snake
Pima pineapple cactus
Nichol turk's head cactus
California leaf-nosed bat
Mexican long-tailed bat
Pale Townsend's big-eared bat
Lesser long-nosed bat
Merriam's mouse
Jaguar
Ocelot

Specific impacts to the Tucson shovel-nosed snake

The Tucson shovel-nosed snake (*Chionactis annulata klauberi*) is a small colubrid adapted to the sandy loams of the northeastern Sonoran Desert region of central and southeastern Arizona. It was petitioned for listing as “threatened” or “endangered” under the US Endangered Species Act (ESA) based on its habitat specialization in sandy desert flats subject to agricultural conversion and urban sprawl and its disappearance from the Tucson region (Center for Biological Diversity 2004). The subspecies was defined based on the strong infusion of black pigment on the red crossbands, which may enhance both coral snake mimicry and background-matching via flicker-fusion (Mahrdt et al. 2001). Its geographic range was described by Klauber (1951) and Cross (1979) and additional genetic analysis by Wood et al. (2008, 2014) supported continued recognition of the subspecies but did not define its distributional limits.⁷

⁷ Mahrdt, C.R.; Beaman, K.R.; Rosen P.C.; [et al]. 2001. *Chionactis occipitalis*. Catalog of American Amphibians and Reptiles. 731: 1–12.

Klauber, L.M. 1951. The shovel-nosed snake, *Chionactis* with descriptions of two new subspecies. Transactions of the San Diego Society of Natural History. 11: 141–204.

Cross, J.K. 1979. Multivariate and univariate character geography in *Chionactis* (Reptilia: Serpentes). Dissertation. Tucson, AZ: The University of Arizona. 517 p.
http://arizona.openrepository.com/arizona/bitstream/10150/298514/1/azu_td_7916875_sip1_m.pdf [accessed February 2, 2018].

In 2014 the U.S. Fish and Wildlife Service rejected the snake for ESA listing based on an incorrect range map for the subspecies that included geographic areas within a sister taxon, *C. a. annulata* (USFWS; 2014). In 2018, Bradley and Rosen (in press) produced a more accurate distribution model for the species based on published genetic and distributional data (Figure 1).⁸ They found that 39% of its habitat has been lost to urban development and agriculture and the remaining habitat is in geographically isolated pockets with no genetic connectivity to each other.

The I-11 Recommended Alternative route would have dire consequences for the remaining population of the Tucson shovel-nosed snake through road strikes and further habitat fragmentation. The highway would bisect some of the last intact habitat for the subspecies, including occupied territory within the Avra Valley. Another example of this is evident in the areas between Gila Bend and Maricopa, within and adjacent to the Sonoran Desert National Monument. This has been a reliable place to still see the snake and several individuals have been recorded along highway 238. The Recommended Alternative route would cut through this habitat block and this area would become a population sink as snakes and other wildlife, venturing outside of the monument, would be crushed by trucks and cars.

Further analysis of impacts to the Tucson shovel-nosed snake needs to be completed by the agencies to adequately understand the impacts of corridor alternatives.

Wood, D.A.; Meik, J.M.; Holycross, A.T.; [et al.]. 2008. Molecular and phenotypic diversity in the Western Shovel-nosed snake, with emphasis on the status of the Tucson Shovel-nosed snake (*Chionactis occipitalis klauberi*). *Conservation Genetics*. 9: 1489–1507.

Wood, D.A.; Fisher, R.N.; Vandergast, A.G. 2014. Fuzzy Boundaries: Color and Gene Flow Patterns among Parapatric Lineages of the Western Shovel-Nosed Snake and Taxonomic Implication. *PLoS ONE* 9(5): e97494.

⁸ U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office. 2014. Species Status Report for the Tucson Shovel-Nosed Snake. [Online]. 78 p. Available: <https://www.regulations.gov/document?D=FWS-R2-ES-2014-0035-0002>.

Bradley, C.M. and Rosen, P.R. In Press. Defining suitable habitat and Conservation Status for the Tucson shovel-nosed snake (*Chionactis annulata klauberi*) in the Sonoran Desert. Biodiversity and Management of the Madrean Archipelago IV conference proceedings.

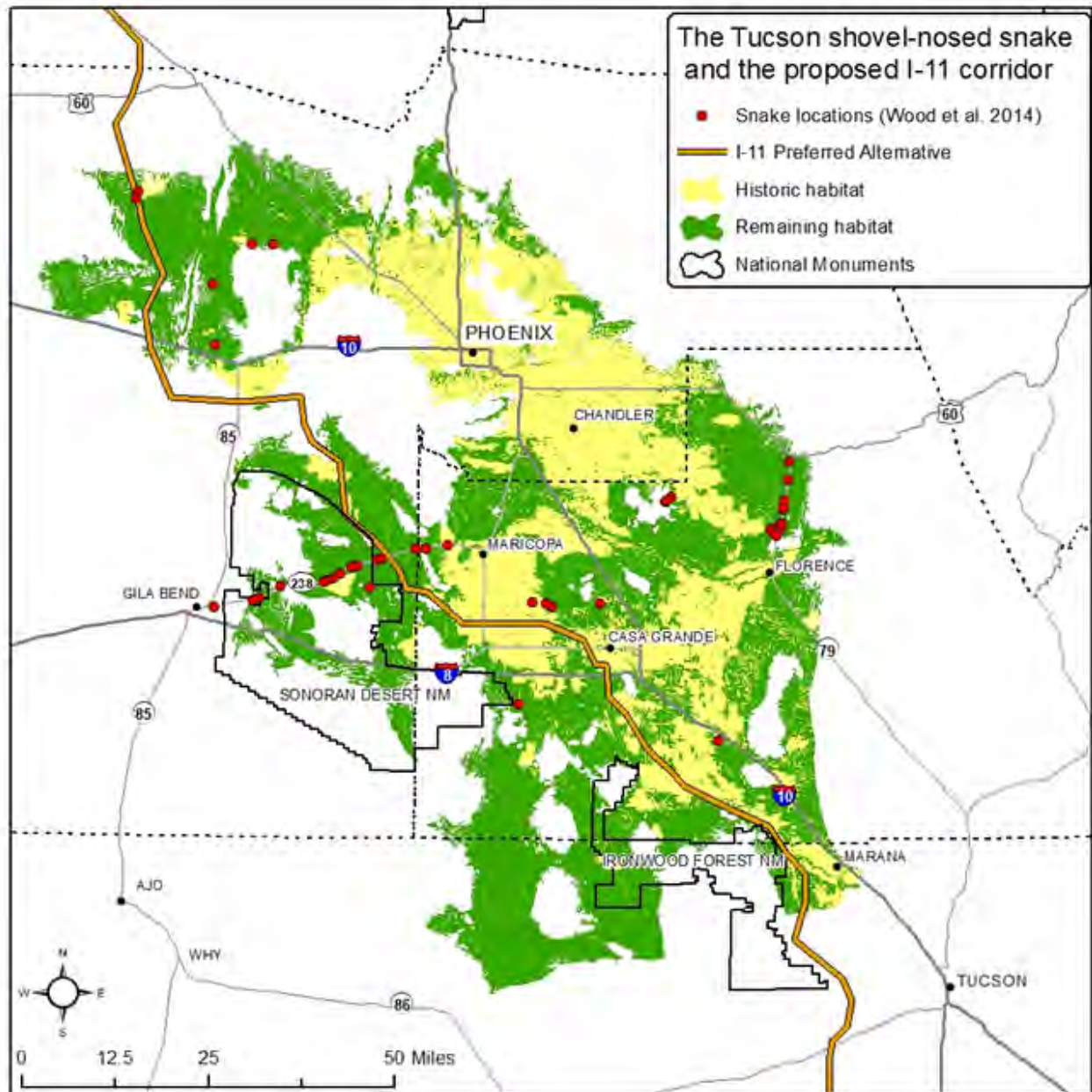


Figure 1: Historic and remaining habitat for the Tucson shovel-nosed snake and the I-11 Recommended Alternative route.

Impacts from noise and light pollution

The Recommended Alternative route would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they use through noise and light pollution. The Recommended Alternative route would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights, street lighting, and from reasonably foreseeable future commercial and residential development.

Impacts to the economy

The Recommended Alternative route runs adjacent to some of southern Arizona's long-standing economic powerhouses, such as the Arizona-Sonora Desert Museum, Saguaro National Park West, and Old Tucson. It also comes perilously close to emerging economic engines such as Ironwood Forest National Monument.

A May 28, 2019 press release directly from Saguaro National Park and the National Park Service stated that, "957,000 visitors to Saguaro National Park in 2018 spent \$62.1 million in communities near the park. That spending supported 866 jobs in the local area, \$31.3 million in labor income and had a cumulative benefit to the local economy of \$90.9 million dollars." The Recommended Alternative route is located within 1,300 feet of the boundary of Saguaro National Park and will have unmitigable impacts on the visitor experience, including increased noise, light, haze and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of viewsheds. None of these impacts can be adequately mitigated.

The Recommended Alternative route is also located within 400 feet of the boundary of Ironwood Forest National Monument, an increasingly popular national monument supported by a robust and active group of volunteers and land managers. A new visitor kiosk was recently installed at IFNM at the Agua Blanca portal and the annual "Meet the Monument" event grows every year, with increasing numbers of participants every year. Building a freeway next to these protected public lands would cause irreparable harm to a place that is gaining momentum and actively investing in the visitor experience.

On April 17, 2019, local newspaper the AZ Daily Star reported on a recent U.S. News and World Report article that identified the Arizona-Sonora Desert Museum as one of the best 30 zoos nationwide. The Recommended Alternative route is located within approximately a half-mile of the Arizona-Sonora Desert Museum. Construction of this route would cause increased noise, light, and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of the viewshed at the museum. None of these impacts can be adequately mitigated.

The Recommended Alternative route would also drive traffic AWAY from Tucson's downtown and growing business districts that rely on traffic from I-19 and I-10 to survive. The City of Tucson resolution adopted unanimously by the Mayor and Council on June 19, 2019 clearly states opposition to the Recommended Alternative route and includes the following statements:

"...Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods.

...Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination.

...In April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district.

...Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics.

...Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations.

...[The] cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson.

...[The] state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions - by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic."

These are all economic arguments for either the No Build alternative or co-locating I-11 with I-19 and I-10 and demonstrate the grave economic consequences to the City of Tucson from the Recommended Alternative route. It is impossible to mitigate for these impacts to Tucson's economy and water supply.

Last, the DEIS needs to improve its analysis of the far-reaching impacts to local governments from building a brand-new freeway in a currently rural area. The Recommended Alternative route would lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other infrastructure and services, the cost of which would likely be borne by local governments such as the City of Tucson, Town of Marana, and Pima County.

Cost of considered alternatives

Our interpretation of the cost of considered alternatives in the DEIS indicates that the Recommended Alternative route would cost approximately \$3.4 billion MORE to construct than the Orange Alternative that co-locates I-11 with I-19 and I-10 in the Tucson region. This estimate is based on information in Table 2-8 on page 2-33 of the DEIS. For Section A-F2, the Green Build Alternative construction costs are estimated to be \$3,998,431,000 and the Orange Build Alternative construction costs are estimated to be \$585,899,000. This leads to the conclusion that it will cost approximately \$3.4 billion more to construct the Green Build Alternative. **We are also unclear why the DEIS does not clearly outline the costs of the Recommended Alternative route (blue on maps), rather leaving it up to the reader to somehow interpret the costs from the other identified routes and where they overlap with**

the Recommended Alternative route. The public should be given clear information for comparison and not be left to make unsure inferences from the incomplete data presented.

One other example of where the DEIS states the costs of considered alternatives in a confusing and incomplete way is in the following section:

Errata 4.5.3

Tunneling – Placing portions of the proposed Project in a tunnel was considered in the property-specific avoidance analysis (Section 4.4.3) as a means to avoid potential impacts to clusters of properties and Historic Districts. FHWA determined that tunneling could result in a use of one or more Section 4(f) properties and, therefore, is not an avoidance alternative. However, even if a way of avoiding use of Section 4(f) properties were to be found, the cost estimate for placing I-11 in a tunnel in Downtown Tucson is approximately \$3.5 to \$5.1 billion, compared to \$240 million for the at-grade concept and \$1 billion for the elevated concept. The extraordinary cost for tunneling indicates that, while tunneling may be feasible, it is not prudent (Avoidance Analysis Factor 4).
Elevated Structures – Elevating I-11 in Downtown Tucson to avoid impacting Section 4(f) properties was considered in the property-specific avoidance analysis (Section 4.4.3.2 and 4.4.3.3). Although the elevated lanes could avoid direct impacts on adjacent Section 4(f) properties, noise and visual impacts would result in adverse effects to historic buildings and structures. Deep excavations for the elevated structure foundations would impact archaeological resources. For these reasons, an elevated lanes alternative through Downtown Tucson is not an avoidance alternative. The elevated alternative also would impact businesses and residences that are not protected by Section 4(f) and would add \$1 billion to the overall capital cost of the Orange Alternative.

It is unclear what specifically the “\$240 million” is referring to in terms of the specific section of highway considered for an at-grade concept. It should also be noted that even though \$1 billion was added to the Orange Alternative in order to elevate I-11 through downtown Tucson, the capital costs would still be \$2.4 billion LESS than the Recommended Alternative route.

In general, we are disappointed with the presentation of the cost of considered alternatives - they are difficult to interpret and should be more clearly and conclusively discussed so compared costs of alternatives are clear to the reader. The examples highlighted above are not exhaustive by any means and we recommend a thorough overhauling of this entire section of the DEIS.

Inadequate 4(F) analysis

The comparison between impacts to the Tucson Mitigation Corridor (TMC) and impacts to the seven historic properties likely to be used if the Orange Alternative is chosen are inadequate as presented in the DEIS.

Use of programmatic “net benefit” evaluation for TMC is inappropriate

Conducting a “net benefit” programmatic evaluation of the proposed use of the TMC is completely inappropriate for this 4(f) property. First, the federal regulations that govern 4(f)

evaluations make clear that the use of programmatic evaluations like the “net benefit” evaluation are to be used only “for certain minor uses of Section 4(f) property.” (23 CFR 774.3(d)) Additionally, per agency guidance, the “net benefit” must be realized on the 4(f) property itself; promising off-site mitigation to offset impacts to a 4(f) property is not the same thing. According to FHWA guidance, a “‘net benefit’ is achieved when the transportation use, the measures to minimize harm, and the mitigation incorporated into the project results in an overall enhancement of the Section 4(f) property... A project does not achieve a “net benefit” if it will result in a substantial diminishment of the function or value that made the property eligible for Section 4(f) protection.”⁹

There is simply no way to achieve a “net benefit” on this 4(f) property, as the use proposed here will, without a doubt, diminish - if not entirely undermine - the ability of the TMC to provide landscape connectivity for wildlife movement. This is especially true considering that this property is itself serving as mitigation for a previous linear project that impacted landscape connectivity in this same area. Regardless of the off-site mitigation promised, it is unlikely that this property will be able to continue to serve as mitigation for that previous project, should this proposed use be approved. **For these reasons, the use of the “net benefit” evaluation for the TMC is simply indefensible. The agencies should conduct an individual evaluation on the TMC property and revise the entire *Draft Preliminary Section 4(f) Evaluation* to consider that individual evaluation.**

Assessment of 4(f) property uses relies on inconsistent information

Because the agencies relied on the incorrect assumption that a “net benefit” would be achieved for the TMC 4(f) property, the DEIS provides no information whatsoever on the actual impacts that may be inflicted on the TMC. No baseline information on the TMC is provided and no information on potential impacts is provided. Without this information, there is no way for the reader to understand what a “net benefit” even means in this context; thus, it is inappropriate to leave this information out. However, because net benefit is inappropriate, it is imperative that the EIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

For example, Google imagery does not provide adequate information for assessing historic integrity and architectural significance for numerous reasons, and there are other far more valid approaches to evaluating such properties that the agencies could have used instead. Acknowledging one of the many pitfalls of this approach, the DEIS admits that “many [properties] were classified as possibly eligible simply because the Google imagery did not provide a clear view.”

In addition, the DEIS is inconsistent in analyzing the costs and feasibility of tunneling through downtown Tucson but does not include a similar analysis of the costs and feasibility of tunneling under the entire 4(f) Tucson Mitigation Corridor.

⁹ “Section 4(f) Evaluation and Approval for Transportation Projects that Have a Net Benefit to a Section 4(f) Property.” Federal Highway Administration Environmental Review Toolkit.
https://www.environment.fhwa.dot.gov/legislation/section4f/4f_netbenefits.aspx.

The DEIS is inconsistent in how it presents information related to the assessment of 4(f) properties. One example of this can be found in a comparison of how information regarding the TMC is represented versus how information regarding the downtown Tucson historic properties is represented. While it is technically true that 15% of the TMC acreage would be within the build corridor (453 out of 2958 acres), far more than just 15% would actually be impacted, considering the purpose for which the TMC was designated (providing landscape connectivity for wildlife movement). In contrast, the EIS asserts that 100% (3 of 3 acres) of the Manning House would be “used;” however, the document goes on to say, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” (EIS at 3.7-24.) Therefore, while 100% of this historic property would be within the corridor, the EIS makes clear that the impact is not 100%. However, with the TMC no parallel consideration of actual impacts is given.

Reliance on insufficient information to compare each Alternative’s potential use of 4(f) properties.

Agencies are required to “identify any methodologies used and shall make explicit reference... to the scientific and other sources relied upon for conclusions in the statement.” (40 CFR 1502.24.) It has long been established that agencies must articulate “a rational connection between the facts found and the choice made.” *Motor Vehicle Mfrs. Ass’n of the U.S. v. State Farm Mut. Auto Ins. Co.*, 463 U.S. 29, 43 (1983).

The flaws resulting from the “net benefit” assumption for TMC aside, the validity of some of the information used to inform the comparison of 4(f) properties is extremely questionable. The information provided for each property is insufficient, in some cases contradictory, and is undermined by inadequate, contradictory information about the properties being compared, and using different metrics.

Scope and Intensity of Impacts to 4(f) properties potentially impacted by Orange Alternative are artificially inflated, while no corollary information is provided for the 4(f) property potentially impacted by the Purple and Green Alternatives.

The DEIS’s comparison of the number of 4(f) properties and their potential use under each alternative is confounding to the reader, precluding meaningful analysis.

Table 4-4 provides the percentage of each 4(f) property located within a build corridor for the various alternatives. However, this information seems to contradict information in the text, causing confusion regarding how potential use of each property is being assessed. This results in a significantly problematic apples-to-oranges comparison of the potential use of each property that tells the reader virtually nothing about the actual potential use of each 4(f) property.

For example, the potential use of the Manning House in downtown Tucson is unclear. First, the property description is inconsistent from one section to the next; on table 4-4 it is described as 1 acre in size, but on table 4-4 it is described as 3 acres in size. Second, Table 4-4 estimates that 100% of the property is subject to “potential use,” but in the text on page 3.7-24 the DEIS

states, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” This indicates that the percentage of “potential use” is not the same as the percentage of the property potentially directly impacted, indicating that indirect impacts are part of the “potential use” consideration. Another example of this is Barrio Anita, where the percentage of the property subject to “potential use” is 85 percent. At the same time, the text states that out of 66 buildings identified in the Barrio Anita Historic District NRHP nomination, the Orange Alternative “could require land from four parcels with contributing residences along the west side of Contzen Avenue but not all of those houses might be directly affected” (EIS at 3.7-24). To make matters more confusing, elsewhere the text states, “The Orange Alternative could require... Removal of at least one historic residential structure adjacent to I-10 in Barrio Anita” (page 4-75). Again, the only explanation for the discrepancy between the percentage of potential use and the amount of land potentially directly impacted is that indirect impacts are considered in the percentage of potential use.

In contrast, the potential use of the TMC property does not appear to include indirect impacts. Table 4-4 shows that only 15% of the property is subject to potential use, with only the percentage of land directly impacted. However, the percentage of potential use would be far larger if indirect impacts are considered for this property, considering how severely compromised the TMC would be as a wildlife movement corridor if an interstate is routed along its entire western boundary or diagonally, from southeast to northwest, through the parcel. There is no explanation for why the TMC is not given the same consideration as the 4(f) properties it is being compared against.

Other discrepancies abound. Page 4-73 provides a list of seven 4(f) properties in downtown Tucson that are subject to potential use by the Orange Alternative, which includes the Barrio Anita Historic District and the David G. Herrera and Ramon Quiroz Park (formerly Oury Park). The analysis uses this number to compare the Orange Alternative’s potential impacts to 4(f) properties to those of the Purple and Green Alternatives, where only one property -- the TMC -- is subject to potential use. However, the text makes clear that Quiroz Park is a contributing property to the Barrio Anita Historic District, and the Park is not listed separately on Table 4-2 or Table 4-4. Inadvertently or otherwise, listing Quiroz Park separately only in this context artificially increases the number of properties potentially impacted by the Orange Alternative and skews the comparison with the Purple and Green Alternatives.

Information provided in Least Harm Analysis is so inadequate it precludes meaningful analysis

Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property

When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, “There is a low ability to mitigate the impacts of the Orange Alternative.”

In addition, on page 4-108 the DEIS states, “After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable...” Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation.

On page 4-96, the DEIS states, “As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property.” This statement explicitly demonstrates skewing of the comparison.

Least harm analysis Factor 3: Relative significance of each Section 4(f) property

The DEIS asserts the following on page 4-97, “FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value.” We strongly disagree with this outlandish statement and urge further evaluation of all Section 4(f) properties. This statement asserts that the entire Tucson Mitigation Corridor is equal to the parking lot of the Manning House, which is a ridiculous and erroneous assertion to make.

Least harm analysis Factor 6

Section 4(f) properties are defined in part as “*publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site).*” The Ironwood Forest National Monument was designated by Presidential Proclamation in June of 2000, under a new protective classification of federal Bureau of Land Management lands. We disagree with the conclusion in the DEIS (Appendix F) that fails to recognize Ironwood Forest National Monument as a Section 4(f) property.

Furthermore, the DEIS fails to consider the magnitude of adverse impacts on multiple properties not protected by Section 4(f). For example, for the Purple and Green Alternatives, this analysis must include the Ironwood Forest National Monument (see above), Tucson Mountain Wildlife Area, and Sonoran Desert National Monument. We believe these properties should be considered as 4(f) properties. However, even though these properties are not considered 4(f) properties, this does not mean there are no adverse impacts to them.

Consideration of other transportation strategies

The DEIS and the choice of the Recommended Alternative route overlooks other less costly options that would encourage the free flow of goods through our region. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;

- Technologies that improve traffic flows;
- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

During the Scoping phase, we strongly recommended a more thorough analysis and consideration of these other transportation strategies that will also better equip our region to adapt to the growing impacts of climate change. Assessing the cumulative impacts of these options on congestion also needs to be more thoroughly considered in the DEIS. **We reiterate our request for this more thorough analysis in future planning efforts and this analysis be completed and shared with the public prior to designating a Preferred Alternative.**

Additional necessary studies

The following studies must be completed prior to designating a Preferred Alternative, with the results communicated to the community and incorporated into the decision process early on:

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the Recommended Alternative route. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Brawley/Los Robles wash system and Santa Cruz River.
- Social and economic equity impacts.

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any Recommended Alternative route. Furthermore, we strongly encourage ADOT and FHWA to refer to the “I-11 Super Corridor Study” final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and the University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Using such studies and designs would help us reduce impacts in Tucson's downtown and surrounding areas should co-location be further considered.

Other factors that must be more thoroughly analyzed for all corridor alternatives include how continued climate change, which is a reasonably foreseeable circumstance, will impact Arizona's water resources and projected population growth; public health implications,

including increased air pollution and the proliferation of valley fever; and long-term impacts on local and regional land-use plans.

The Recommended Alternative route through Avra Valley would facilitate commercial and residential development in this area. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.

Considering the identified Recommended Alternative route in the DEIS, we argue that either the No Build alternative or improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental and larger community impacts. **Because of this, we stand in strong opposition to the Recommended Alternative route.**

Local government opposition

In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 (attached) opposing “the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.” Additionally, the Board called for the expansion of “capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.”

Additionally, in April 2019 Pima County Board of Supervisors’ Chair Richard Elías and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, “The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through ‘invaluable Sonoran Desert areas.’ That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it” (attached). We strongly concur with Pima County’s elected officials and their resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, “The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction

of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately mitigated and that are contrary to the interstate design standards and criteria that must be applied to the project.”

On May 18, 2019, Arizona District 3 Congressman Raúl Grijalva submitted comments on the DEIS voicing his opposition to the Recommended Alternative route. We have attached the Congressman’s letter as well.

Thank you for the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. **Given the far-reaching and devastating impacts that the Recommended Alternative route would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, we express our strong opposition to the Recommended Alternative route and feel that should additional capacity be warranted, that reconfiguration of existing highways is the only acceptable Alternative. This DEIS is replete with inadequate analyses and is, in and of itself, a fatal flaw.** We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jodi Netzer, Director
Tucson Entrepreneurs

Robin Clark *for*
Avra Valley Coalition

Tom Hannagan, President
Friends of Ironwood Forest

Louise Misztal, Executive Director
Sky Island Alliance

Barbara Rose, Project Coordinator
Safford Peak Watershed Education Team

Diana Hadley, Co-President
Northern Jaguar Project

Demion Clinco, President
Tucson Historic Preservation Foundation

Sandy Bahr, Chapter Director
Sierra Club - Grand Canyon Chapter

Meg Weesner, Chair
Sierra Club - Rincon Group

Emily Yetman, Executive Director
Living Streets Alliance

Kevin Gaither-Banchoff, Development
Director
WildEarth Guardians

Peter Chesson, President
Tucson Mountains Association

Gayle Hartmann, President
Save the Scenic Santa Ritas

Robert Villa, President
Tucson Herpetological Society

Terry Majewski, Chair
Tucson-Pima Historical Commission

Ivy Schwartz, President
Community Water Coalition of Southern
Arizona

Jonathan Lutz, Executive Director
Tucson Audubon Society

Nancy Williams, President
People for Land and Neighborhoods

Fred Stula, Executive Director
Friends of Saguaro National Park

Pearl Mast and Anna Lands, Co-Chairs
Conservation Committee
Cascabel Conservation Association

Randy Serraglio, Southwest Conservation
Advocate
Center for Biological Diversity

Myles Traphagen, Borderlands Project
Coordinator
Wildlands Network

Gary Kordosky, President
Gates Pass Area Neighborhood Association

Della Grove, President
Citizens for Picture Rocks

Jessica Moreno, President
Arizona Chapter of The Wildlife Society

Mike Quigley, Arizona State Director
The Wilderness Society

Robert Peters, Southwest Representative
Defenders of Wildlife

Attachments: April 2019 Memo from Pima County Supervisors Richard Elías and Sharon
Bronson
Pima County Resolution No. 2007-343
City of Tucson Resolution No. 23051
May 2019 Letter from Rep. Raúl Grijalva (D-AZ)

ATTACHMENTS

April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson



PIMA COUNTY BOARD OF SUPERVISORS

130 WEST CONGRESS STREET, 11th FLOOR
TUCSON, ARIZONA 85701-1317

(520) 724-8126
district5@pima.gov
www.district5.pima.gov

To Whom it May Concern:

The Pima County Board of Supervisors adopted Resolution No. 2007-343 on December 18, 2007, setting forth its opposition to construction of an Interstate highway through "Invaluable Sonoran Desert areas." That remains the official position of Pima County government.

At the time, the proposal under consideration was for an Interstate 10 Bypass Freeway, but it was along the same suggested routes as the currently proposed Interstate 11. A "favored" route then, as now, was through Avra Valley.

A freeway through the Avra Valley or other parts of the delicate Sonoran Desert is not compatible with the county's landmark Sonoran Desert Conservation Plan or with its Sustainability Plan to combat climate change in line with the 2015 Paris Agreement.

A freeway would destroy sensitive habitat for many of the 44 unique species of concern that the Conservation Plan protects. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn.

The Sustainability Plan aims to steer the county government operations away from fossil fuel use and dependency, and a new freeway would promote increased fossil-fuel use, to the detriment of our air quality as well as to climate change.

A freeway through Avra Valley would impact severely and negatively such jewels and tourist areas as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Arizona-Sonora Desert Museum. It would diminish vastly the quality of life of thousands of Avra Valley residents.

The cost of buying land for and building an entirely new freeway would be tremendous, when we do not have enough funds to maintain properly our existing roads and highways. It would cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

An Interstate 11 would divert traffic away from existing businesses that depend on Interstate 10 and Interstate 19 traffic visibility for their survival.

A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it.

Sincerely,

Richard Elías, Chairman
Pima County Board of Supervisors

Sharon Bronson, District Three Supervisor
Pima County Board of Supervisors

RESOLUTION NO. 2007- 343

**A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS IN
OPPOSITION TO CONSTRUCTION OF AN INTERSTATE HIGHWAY LINK
THAT BYPASSES TUCSON AND TRAVERSES PRISTINE AND INVALUABLE
SONORAN DESERT AREAS**

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

WHEREAS, Pima County has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel to this effort because of their greenhouse-gas and pollutant emissions, and therefore calls for the County to shift its fleet to use alternative fuels; and

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new controlled-access highway would be enormous, requiring the acquisition of thousands of acres of new rights of way, expenditures on high and rapidly increasing costs of concrete and asphalt, putting a tremendous burden on taxpayers and future highway users; and

WHEREAS, the production of the millions of tons of concrete and asphalt for this massive construction project would cause significant air pollution and greenhouse gas emissions, as would the operation of heavy machinery in the construction process; and

WHEREAS, a new controlled-access highway near or through Pima County on any route, would promote urban sprawl, causing local governments to incur large financial responsibilities for new infrastructure costs and force major changes to existing county land-use and zoning designations; and

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; and

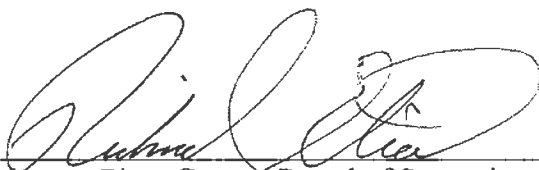
WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

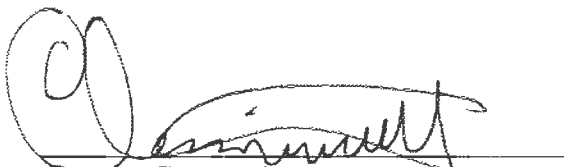
2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.


Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:


Clerk of the Board
Deputy County Attorney

ADOPTED BY THE
MAYOR AND COUNCIL

June 18, 2019

RESOLUTION NO. 23051

RELATING TO PUBLIC HEALTH AND SAFETY: DECLARING MAYOR AND COUNCIL'S OPPOSITION TO CONSTRUCTION OF A NEW INTERSTATE HIGHWAY THAT BYPASSES THE CITY OF TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS; AND DECLARING AN EMERGENCY.

WHEREAS, the City of Tucson (Tucson) works to advance goals of sustainability, equity, economic growth and vibrant, livable neighborhoods; and

WHEREAS, in November 2013 Tucson voters adopted Plan Tucson, the City of Tucson General Plan & Sustainability Plan; and

WHEREAS, Tucson has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel because of their greenhouse-gas and pollutant emissions; and

WHEREAS, Plan Tucson seeks to create, preserve, and manage biologically rich, connected open space; wildlife and plant habitat; and wildlife corridors, including natural washes and pockets of native vegetation, while working to eradicate invasive species; and

WHEREAS, an interstate highway in the Avra Valley would degrade the Sonoran Desert, sever wildlife corridors, impede washes and flood prone areas, open new areas to intense residential and commercial development

far from existing urban centers, and encourage more car and truck travel at time when climate change and air pollution are growing concerns; and

WHEREAS, Tucson strives to protect night skies from light; and

WHEREAS, Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods; and

WHEREAS, Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination; and

WHEREAS, in April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district; and

WHEREAS, Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics; and

WHEREAS, Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations; and

WHEREAS, the Interstate 11 Draft Tier 1 Environmental Impact Statement Recommended Alternative route would run through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park - West, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona

Project mitigation parcel, and severing linkages between important habitat areas and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson; and

WHEREAS the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions – by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately

mitigated and that are contrary to the interstate design standards and criteria that must be applied to this project.

SECTION 2. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City of Tucson that this Resolution become immediately effective, an emergency is hereby declared to exist and this Resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Tucson, Arizona, June 18, 2019.

MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM:

REVIEWED BY:



CITY ATTORNEY

CITY MANAGER

MR/dg
6/13/19

COMMITTEE ON NATURAL RESOURCES
CHAIRMAN

COMMITTEE ON EDUCATION AND LABOR
HIGHER EDUCATION AND WORKFORCE INVESTMENT
SUBCOMMITTEE

CIVIL RIGHTS AND HUMAN SERVICES SUBCOMMITTEE

CONGRESSIONAL PROGRESSIVE CAUCUS
CHAIR EMERITUS

Congress of the United States
House of Representatives
Washington, DC 20515-0307

WEBSITE: <http://grijalva.house.gov/>

May 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

Also emailed to: I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Dear Mr. Van Echo,

I would like to take this opportunity to provide input during the public comment period on the Draft Tier 1 EIS referenced above.

I am concerned that the current comment period is too short for a comprehensive review of this extremely large document (762 pages plus appendices). I request that the comment period be extended for a total of 120 days—which is common for projects of this magnitude and controversy—making the revised due date for comments August 3, 2019.

I support efforts to physically connect Arizona and Nevada via transportation corridors to facilitate Canadian and Mexican trade routes. The City of Tucson and the metro region of Pima County would benefit most by enhancing existing infrastructure that already provides the connection: Interstate 10 and 19, or option “A” and “B” that have been included in your route studies.

I am **very concerned** that a hybrid option of routes going through Altar and Avra Valley has instead been chosen for the preferred alternative in the Draft Tier 1 EIS. This route would necessitate building new interstate. This route would negatively impact rural communities in Avra Valley, Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and other protected open spaces and wildlife corridors. I pointed this out during the scoping process in a June 1, 2017, letter to project manager Jan Van Echo. For the record I would like to repeat my concerns:

This proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values, and quality of life for residents of that community. Even a limited access roadway would still open this mainly undeveloped area to massive sprawl. Residents of my district affected by this option have called my office expressing these same concerns. Pima County voters have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, the Federal Highway Administration and the Arizona Department of Transportation must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concerns expressed

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FACEBOOK: [Facebook.com/Rep.Grijalva](https://www.facebook.com/Rep.Grijalva)
TWITTER: [Twitter.com/RepRaulGrijalva](https://twitter.com/RepRaulGrijalva)
INSTAGRAM: [Instagram.com/RepRaulGrijalva](https://www.instagram.com/RepRaulGrijalva)

all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

One explanation for this conclusion is that a Tier 1 analysis is not enough for a federal process to come up with the better route alternative. The tiering of the required environmental compliance means that the decision is not informed by the best information and that vague promises of future mitigation is enough to allow the incredible decision to bisect an important wildlife mitigation area with a major freeway. This calls into question the Department of Transportation's unusual practice of coming to a decision without the full environmental compliance that most other federal projects regularly require.

A proposed MOU giving the state environmental compliance responsibilities for federal highway projects in Arizona, which would include the Tier 2 study, further demonstrates the inappropriate fragmentation of planning and compliance this project will receive, especially compared to projects with this sort of impact on protected lands that our community would normally expect.

Another issue of concern is the regularity with which this route keeps re-surfacing. Voters overwhelmingly voted against a ½ cent sales tax that would have funded a similar project back in the mid-1980s. The Picture Rocks community along with many other Pima Country residents and organizations have and continue to vocally oppose it, yet this route keeps being promoted as the preferred option.

Very little is being done to address alternatives to continuous freeway expansion, such as facilitating the expansion and use of intermodal shipping yards, facilitating the creation of public rail transportation lines as alternatives to continuously promoting freeway development—especially in pristine habitat corridor areas. I consistently remain opposed to any highway plan that opens up the Avra valley to widespread environmental destruction.

The possible fast tracking of this project, despite information typically disseminated by the project's managers at public meetings that there is not current funding available, is concerning. While that may be currently true, this project is in conjunction with the Federal Highway Administration, I-11 and Intermountain West Corridor Study (IWCS) completed in 2014. With talk in Congress about developing an infrastructure spending package, the state appears to be attempting to remove all barriers to fast tracking this project once, and if, funding is available. If Congress is able to pass an infrastructure package, the voters will have no say, as planning will be completed, and routes will have been previously selected.

If the project's purpose is to provide a high-priority north to south transportation corridor to connect to major metropolitan areas and markets with Mexico and Canada, then I believe that the best option is using Interstate 10 and 19, which already includes metropolitan Tucson and protects the environmentally sensitive area west of Tucson.

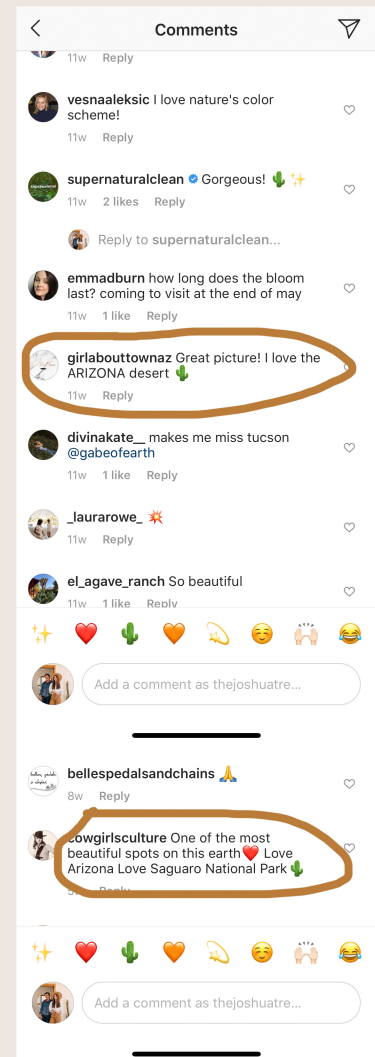
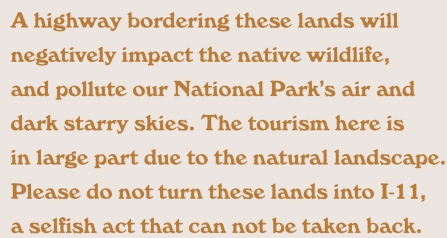
Thank you for your time and the opportunity to provide input.

Sincerely,



Raúl M. Grijalva,
Member of Congress, (AZ-03)

Cc: Jan Van Echo, PE, ADOT I-11 Study Manager





**Southern Arizona
Home Builders
Association**

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David M. Godlewski

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Tim Staring
TRS Custom Builders

1st Vice Chairman

John Ward
Urban Moment

2nd Vice Chairman

Tom Gansheimer
Lennar Homes

Secretary/Treasurer

Ginger Kneup
Bright Future Real Estate
Research, LLC

Immediate Past Chair

Brent Davis
DR Horton

Affiliated With



July 3, 2019

Cote, S
SAHBA
O-60

To whom it may concern,

Thank you for the opportunity to comment on the proposed Draft Tier 1 Environmental Impact Statement for Interstate 11-Nogales to Wickenburg. After careful review of the options presented by the EIS, the Southern Arizona Home Builders Association supports the Recommended Corridor Alternative (RCA).

We believe the RCA provides a true alternate corridor that will enhance north south traffic to and from Mexico while enhancing the region's ability to address regional emergencies and evacuations. Additionally, the RCA would provide much needed relief from truck traffic on I-10 which would significantly improve traffic flow while reducing the need to invest in widening I-10.

The plan to widen I-10 lacks the detail to understand the economic and environmental impact this restructuring will cause. According to ADOT, this project would require 40 miles rebuilt in urban areas, but does not present reliable cost estimates for the project. Additionally, there is no assessment of how an I-10 widening would impact the revenues of our local businesses. At a minimum, an I-10 widening would cost \$10 billion more than the RCA which would be better invested in other Southern Arizona regional transportation projects.

In addition to our support of the RCA, we strongly oppose the No Build Option. As trade increases with Mexico, we need additional trade route capacity and a transportation plan which best enhances that trade relationship. Arizona cannot afford to lose the \$3 billion we receive in international trade with Mexico. Furthermore, according to a 2008 ADOT study Tucson cannot bring more traffic through downtown so a No Build Option is not a viable option.

The Southern Arizona Home Builders Association asks you to work in the best interest of our entire region by supporting the Recommended Corridor Alternative and strongly opposing the No Build Option. We also ask how the EIS will address the economic impacts of increased international trade.

Thank you for your consideration.

Shawn Cote

From: w critchlow wcritchlow2@gmail.com
Subject: I-11 corridor
Date: June 23, 2019 at 12:42 PM
To: FHWA/ADOT officials

To the FHWA/ADOT officials. The FHA and the AZ> DEPT of Transportation are recommending that the future I-11 corridor should be built right on the edge of Rancho Buena Vista(between Twin Buttes and El Toro roads. As a RBV homeowner, I object to the negative impact this project would cause to wildlife,noise,air quality, and light pollution as well as to the local economy and private property. Thank you for considering what we believe to be serious negative impacts that this project would bring to our area! VTY

W. Critchlow
Lynn Critchlow

BILL AND LYNN CRITCHLOW

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