



Coalition for Sonoran Desert Protection

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Arizona Center for Law
in the Public Interest

Arizona League of Conservation
Voters Education Fund

Arizona Native Plant Society

Bat Conservation International

Center for Biological Diversity

Center for Environmental
Connections

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Drylands Institute

Empire Fagan Coalition

Environmental and Cultural
Conservation Organization

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

Native Seeds/SEARCH

Neighborhood Coalition of
Greater Tucson

Northwest Neighborhoods
Alliance

Oro Valley Neighborhood
Coalition

Protect Land and
Neighborhoods

Safford Peak Watershed
Education Team

Save the Scenic Santa Ritas

Sierra Club—Grand Canyon
Chapter

Sierra Club—Rincon Group

Silverbell Mountain Alliance

Sky Island Alliance

Sky Island Watch

Society for Ecological
Restoration

Sonoran Arthropod
Studies Institute

Sonoran Permaculture Guild

Southwestern Biological
Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

Women for Sustainable
Technologies

Jennifer Eckstrom, Chair
PAG Regional Council
177 N. Church Ave., Suite 405
Tucson, AZ 85701

RE: 2040 Regional Transportation Plan Update/Amendment

Dear Chairwoman Eckstrom and Regional Council Members:

I am writing on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 41 environmental and community groups working in Pima County, Arizona. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. We achieve this mission by primarily advocating for: 1) the protection and conservation of Pima County's most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species.

I am writing in response to a request for comments on the 2040 Regional Transportation Plan (RTP) Update/Amendment currently under consideration by the Pima Association of Governments (PAG). Below I outline our concerns and have structured our comments under the questions on the official "Comment Form" for clarity.

1. Proposed Changes to the 2040 RTP Amendment include 6 new projects and 6 amended projects. What specific comments do you have on these project updates and changes?

The Coalition is primarily concerned with "Project D – SR83: I-10 to County Line." This new project proposes the following:

[To] widen SR83 for 22 miles south of the Interstate 10 junction in phases over approximately 30 years from two lanes to four lanes based on the needs of the highway to accommodate the expected increase of traffic from various sources including population increases, private development, etc. The proposed phase improvements include passing lanes, wider shoulders, bus pullouts, drainage improvements, and ultimately accommodating four lanes with shoulders.

First, we question the justifications for this project, especially the contention that projected population increases in the area around SR83 would warrant expansion of the highway from two to four lanes. The town of Sonoita currently has a population of just over 800 people (2010 U.S. Census data). According to PAG Transportation Services Director Jim DeGrood¹, 2040 traffic projections (7,000 daily trips in Sonoita, 10,000-12,000 daily trips between Sonoita and I-10, and 15,000 daily trips at I-10) are “on the margins” of the number of daily trips needed to justify an expansion to four lanes. Without further explanation of what population projections are referred to in the project summary, this reason seems dubious at best.

Given the rural character of SR83, “private development” also needs to be explained further. The only significant private development that would substantially increase traffic on SR83 is the proposed Rosemont Copper Mine. This project is still undergoing rigorous environmental review and has multiple permits and approvals that are outstanding. Committing \$76 million in public monies to widen a scenic highway based on faulty and unsure premises is poor planning and an unacceptable use of tax dollars.

The Coalition encourages you to reject this proposed amendment to the 2040 RTP.

2. How might the proposed 2040 RTP changes affect you or your immediate neighborhood either positively or negatively (e.g. increase safety, increase access to jobs and services; relieve congestion; other impacts on the environment, neighborhoods and/or businesses, etc.)?

Expanding SR83 from two to four lanes would greatly diminish the scenic nature of this highway. SR83 is one of 18 officially designated “scenic roads” in Arizona. The Arizona Office of Tourism, *Arizona Highways* magazine, and the U.S. Department of Transportation have created a website called “Arizona Scenic Roads.”² This website provides information, maps, and a description of Arizona’s scenic roads (including historic roads, parkways, byways, All-American roads, and scenic roads). The section on SR83 describes this scenic road as, “...miles of lush rambling hills shouldered by the Coronado National Forest [including] several natural destination points, havens for birds, butterflies, animals, blooming wildflowers and towering cottonwood trees...” A more detailed description states:

The violet-crowned hummingbird’s wings spin ceaselessly like a natural pinwheel of brilliant color. Its lively chatter and conspicuous behavior make it easy to spot for **birdwatchers who travel great distances to reach this place in the desert** where many species of birds and animals make their permanent and migratory homes.

As visitors traverse the winding highway, they reach an area marked by wildflowers and towering cottonwoods and sycamores. Sometimes you see them popping out of a

¹ Davis, Tony. January 15, 2012. “Plans to widen Sonoita highway raise eyebrows.” Arizona Daily Star, Tucson, AZ.

² <http://www.arizonascenicroads.com>

car along the road as they catch a flash of color or flick of wing. Binoculars at the ready, these birders mine their field of vision well.

The experienced recite the characteristic of their visual prey while the amateurs juggle reference books. They all share a yearning to view, even if for a flittering moment, the jewels that shimmer and glide through the Santa Cruz region of southeastern Arizona. **And they take the Patagonia-Sonoita Scenic Road [SR83 and SR82] to get there**(emphasis added).

The expansion of SR83 would greatly diminish the scenic nature-based values described above and negatively impact the many natural resources that draw tourists, birders, and other recreationists to this area, along with the critical dollars they contribute to the local economy and the jobs they support.

One of these natural resources is an important wildlife linkage – the Rincon-Santa Ritas-Whetstones wildlife linkage, as described in detail in one of the 2006 Arizona Missing Linkages reports³. This report states,

State Route 83 (Sonoita Highway) lies between the Santa Rita Wildland block and other two Wildland blocks. Only moderate traffic now occurs on this 2-lane road, so it is not a major barrier today. However, **if the road is widened or traffic increases significantly, it could become less permeable to wildlife.** When road improvements are planned within a linkage strand (or within any publicly owned land), one bridged crossing for large mammals should be created per 0.9 miles of roadway, plus small pipe or box culverts approximately every 1/5 mile...Running north-south through strands 1 and 5 of the linkage, **increased lanes or increased traffic on Sonoita Highway would threaten connectivity between the Santa Rita and Whetstone wildland blocks** (emphasis added).

An SR83 expansion would seriously threaten and further imperil this sensitive wildlife linkage, a linkage that is also identified as a “Critical Landscape Connection” in Pima County’s Sonoran Desert Conservation Plan.

Finally, keeping in mind the recommendations for wildlife crossings summarized above, were wildlife crossings incorporated into the \$76 million budgeted for this project?

³ Beier, P., D. Majka, and T. Bayless. 2006. Arizona Missing Linkages: Rincon-Santa Rita-Whetstone Linkage Design. Report to Arizona Game and Fish Department. School of Forestry, Northern Arizona University. Note: This report was one of several produced as part of the Arizona Wildlife Linkages Assessment, sponsored by Arizona Department of Transportation, Arizona Game and Fish Department, other state and federal agencies, and non-profit organizations. See http://www.azdot.gov/inside_adot/OES/AZ_WildLife_Linkages/assessment.asp and www.corridor-design.org for more information.

3. Please provide any other comments or questions you may have regarding the proposed 2040 RTP update/amendment.

In general, we encourage PAG to be transparent about the reason for this proposed RTP Amendment. If this project is being proposed to accommodate the Rosemont Copper Mine (which has yet to be approved), then the project description should clearly state this fact. If this is the case, then further public discussion needs to take place regarding the appropriate entity to pay for this road expansion. We strongly believe that Rosemont Copper should bear the full cost of a road expansion if it is their project that would contribute the vast majority of increased traffic to the roadway. Finally, given the numerous permits and approvals that are still outstanding for the Rosemont Copper Project, this RTP Amendment should not be considered until the mine is fully permitted, should that occur in the future.

Again, the Coalition encourages the PAG Regional Council to reject “Project D – SR83: I-10 to County Line” as a 2040 RTP Amendment.

Thank you for considering our comments on this RTP Amendment. If you have any questions, please do not hesitate to contact me.

Sincerely,



Carolyn Campbell
Executive Director