



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/>

**These talking points can be used to inform you comments at public meetings
and for written comments.**

1. Two public meetings are being held in southern Arizona. Please attend and use your voice to speak up for the desert!

Wednesday, 5/8/19 | 3–8 p.m.

Tucson Convention Center Ballrooms/Lobby

[260 S. Church Avenue, Tucson](#)

Saturday 5/11/19 | 11 a.m.–4 p.m.

Marana High School Cafeteria

[12000 W. Emigh Road, Marana](#)

2. You can submit public comments in multiple ways, including:

♥ At a **public meeting** (see above)

🖥 **Online:** i11study.com/Arizona

📞 **Phone:** 1.844.544.8049 (bilingüe)

✉ **Email:** I-11ADOTStudy@hdrinc.com

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

The full draft of the DEIS can be found at: <http://origin.i11study.com/Arizona/Documents.asp>



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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