

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

1511 Longworth HOB
Washington, DC 20515
Phone (202) 225-2435 | Fax (202) 225-1541

101 W. Irvington Rd., Bldg. 4
Tucson, AZ 85714
Phone (520) 622-6788 | Fax (520) 622-0198

146 N. State Ave.
P.O. Box 4105
Somerton, AZ 85350
Phone (928) 343-7933 | Fax (928) 343-7949

1412 N. Central Ave., Suite B
Avondale, AZ 85323
Phone (623) 536-3388 | Fax (623) 535-7479

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