



CITY OF  
TUCSON

OFFICE OF THE  
CITY MANAGER

July 1, 2019

Karla S. Petty  
Arizona Division Administrator  
Federal Highway Administration  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012-3500

RE:  
999-M(161)  
TRACS. No. 999 SW O M5180 O1P  
I-11, I-19/SR 189 to US 93/SR 89  
I-11 Corridor Draft Tier 1 EIS

**Subject:** Your letter dated April 26, 2019

**City of Tucson Comments on the Sahuarita to Marana Area of the  
Draft Tier 1 Environmental Impact Statement and Preliminary  
Section 4(f) Evaluation for the Interstate 11 Corridor**

Dear Ms. Petty,

Thank you for the opportunity for the City of Tucson to review and comment on the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Interstate 11 Corridor (Draft Tier 1 EIS) and for extending the review period to ensure all critical issues can be acknowledged.

For your information and inclusion in the Final Tier 1 EIS, we have attached all the previous correspondence from the City of Tucson (July 8, 2016 to Aryan Lirange, December 23, 2016 to Rebecca Yedlin, March 17, 2017 to Rebecca Yedlin, May 5, 2017 to Jay Van Echo and November 16, 2017 to Karla S. Petty ), a copy of the Mayor and Council Resolution concerning the Draft Tier 1 EIS, and a verbatim transcript of the comments of the City of Tucson Mayor and Council concerning this item during the study session held on June 18, 2019. Please note the Mayor and Council Resolution supports the use of the existing I-19/I-10 alignment for I-11 and opposes any alignment that goes through Avra Valley.

City staff has reviewed the draft and have found several items of concern that have resulted in the City of Tucson questioning the selection of a recommended alignment at this time. Our review has brought into question the following concerns:

- The “Green” Alternative (Sahuarita to Marana) does not meet the Purpose and Need involving Population and Employment Growth. Connections to Marana

and Sahuarita do not constitute connections to the Tucson metropolitan area which is growing at a pace not reflected in the inaccurate population projections provided by the Pima Association of Governments (PAG) for this study. The majority of future population growth is projected to occur in the Tucson urban area. This was recently acknowledged by the updated PAG population projections. These newer and more accurate projections use a more accurate model and should be used in this study to properly analyze the impacts to the largest population and employment growth area in the southern reach of this study.

- The “Green” Alternative (Sahuarita to Marana) does not meet the Purpose and Need involving System Linkages and Regional Mobility nor the Access to Economic Activity Centers. This alignment bypasses the largest economic driver in Southern Arizona, the City of Tucson. The City requests that ADOT conduct a comprehensive Economic Impacts Analysis to estimate the financial impacts to the Tucson area if tourists and other motorists from Mexico bypass Tucson. The stated purpose of supporting improved regional mobility for people, goods, and homeland security is specifically missing, and connections must be made to the City of Tucson or this goal is not met.
- The “Green” Alternative clearly pulls economic activity away from the core business and industrial areas of Tucson, not only downtown, but also industrial parks around the airport, UA Tech Parks and the Port of Tucson noted above and negates our infrastructure investment in the region. In particular, developments such as the Port of Tucson, that are just beginning to build out as logistics and transportation hubs, will not readily benefit from a western alignment that completely bypasses this area. The recent momentum of the business and industrial development in the core of Tucson will erode with the construction along the recommended alignment, causing competing sites to pull economic activity away from areas just now working to establish themselves. Instead, the costs of bringing infrastructure to the proposed alignment will make it difficult to achieve successes in a timely manner, delaying Arizona's ability to deliver a freeway solution that begins moving goods and services in a fast, efficient manner which is in every jurisdiction's best interest.
- For both the “Green” and “Orange” Alternatives, there are critical impacts to biological, water storage, 4(f), and cultural resources that require more in-depth study before it would be appropriate to recommend either of these

alignments. The mitigation of impacts of the “Green” Alternative to the main source of Tucson’s regional water supplies has not been fully explored. This alternative appears to severely impact the Central and Southern Avra Valley Storage and Recovery Projects (CA VSARP/SA VSARP) facilities in Avra Valley, which are the main water sources of the Tucson Active Management Area (AMA) and store water for the City of Phoenix, the Southern Nevada Water Authority, and the Arizona Water Banking Authority (AWBA). The “Green” Alternative will also impact wildlife migratory movements, sever existing habitats and territories, and affect natural areas and regional park viewsheds. The mitigation of these economic and environmental impacts has not been fully explored. The “Orange” Alternative has impacts related to the significant historic and cultural resources through Tucson that have not been fully explored.

- The City requests that ADOT conduct an in-depth analysis of the “Green” Alternative to take into consideration the full impacts to the environment and water resources. This analysis should use a 400-foot wide highway corridor, fully explain the impact to the regional CA VSARP/SA VSARP facilities, include specific mitigations for any potential Hazardous Materials spills to ensure the water supply remains protected, and better define the wildlife impacts.
  
- The “Green” Alternative hits every bullet on the list ADOT mentioned during the slide presentation given on Jun 18, 2019 at the City of Tucson Mayor and Council Study Session. Specifically, the list outlines areas that are to be avoided with any alignment. That list is as follows:
  - 1) National parks and monuments: This alternative between Sahuarita and Marana goes directly adjacent and through the viewsheds of the Ironwood Forest National Monument and the Saguaro National Park.
  - 2) Wilderness areas: Almost the entire alignment between Sahuarita and Marana is in natural desert that is currently wilderness.
  - 3) Roadless areas: Almost the entire alignment between Sahuarita and Marana is in natural desert that is currently mostly roadless.
  - 4) Critical habitats: Much of this alternative between Sahuarita and Marana is adjacent to and at least partly through critical habitat for birds and several varieties of important cactus. The environmental document admits this alternative will increase mortality of Species of Economic and Recreational Importance.

Name: Karla S. Perry

Date: July 1, 2019

Page: 4

- 5) Section 4(f) properties: This alternative between Sahuarita and Marana goes through Anza Park and the Bureau of Reclamation wildlife travel corridor.
  - 6) Tribal lands: This alternative between Sahuarita and Marana is adjacent to and appears to infringe on the Tohono O'odham Nation land.
  - 7) 100-year floodplains/floodways: This alternative between Sahuarita and Marana appears to cross several floodplains, but more importantly, negatively impacts the CA VSARP/SA VSARP.
  - 8) Impacts to existing development: This alternative impacts this item the least.
- ADOT's Long-term Maintenance and Financial Obligations - According to ADOT's long-range transportation plan for 2040, there is a \$30.5 billion funding shortfall. The City's concern is that a new 50-mile section of interstate highway through Avra Valley will cost billions of dollars, taking away funding for maintenance and upgrades to the existing I-10 and I-19 corridors and other critical mobility enhancements within our region. The City of Tucson asks that ADOT invest in the existing facilities before building new stretches of interstate.

The City requests that ADOT conduct an in-depth analysis of the "Orange" Alternative to more fully ensure that adverse impacts, both direct and indirect, to significant historic resources and any mitigations to those impacts are more completely understood. This analysis should use an alignment that stays within the existing right of way of I-10 and I-19, understanding that the frontage road areas and other open space within the existing right of way can be used for freeway lanes and assumes no right of way acquisition will be needed.

Based on the above concerns, we strongly recommend further evaluation of the "Build" alternatives. The City of Tucson is strongly in favor of the "Orange" Alternative in the Sahuarita to Marana area—per the attached Mayor and Council resolution.

Sincerely,



Michael J. Ortega, P.E.  
City Manager

Name: Karla S. Perry

Date: July 1, 2019

Page: 5

Attachments:

Previous letters (see below link to Dropbox for attachments)

[https://www.dropbox.com/sh/hkh961wookw8g6j/AAB8Sn7dH-sZ\\_n8CCrJvt0BAa?dl=0](https://www.dropbox.com/sh/hkh961wookw8g6j/AAB8Sn7dH-sZ_n8CCrJvt0BAa?dl=0)

Transcript of the City of Tucson Mayor & Council Study Session item concerning I-11

City of Tucson M&C Resolution concerning I-11

ecc: Electronic copy to the following:

Honorable Mayor and Council Members – City of Tucson

I-II Tier 1 EIS Study Team [I-IIADOTstudy@hdrinc.com](mailto:I-IIADOTstudy@hdrinc.com)

Albert Elias, Assistant City Manager, City of Tucson ([albert.elias@tucsonaz.gov](mailto:albert.elias@tucsonaz.gov))

Diana Alarcon, Tucson Department of Transportation ([diana.alarcon@tucsonaz.gov](mailto:diana.alarcon@tucsonaz.gov))

Sott Clark, Department of Planning and Development Services

([scott.clark@tucsonaz.gov](mailto:scott.clark@tucsonaz.gov))

Jay Van Echo, ADOT Project Manager ([JVanEcho@azdot.gov](mailto:JVanEcho@azdot.gov))

Aryan Lirange, FHWA Senior Engineer ([Aryan.Lirange@dot.gov](mailto:Aryan.Lirange@dot.gov))

Rebecca Yedlin, FHWA Environmental Coordinator ([Rebecca.Yedlin@dot.gov](mailto:Rebecca.Yedlin@dot.gov))



CITY OF  
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November 16, 2017

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

RE: 999-M(161)S  
I-11, I-19/SR 189 to US 93/SR 89  
TRACS No. 999 SW 0 M5180 01P  
I-11 Corridor Tier 1 EIS  
Alternatives Selection Report, October 2017

Dear Ms. Petty,

Thank you for extending the review period to allow us an opportunity to provide comments on the Draft *Alternatives Selection Report* for the Tier 1 Environmental Impact Statement (EIS) for the I-11 Corridor.

In Section 4.1 and Table 4-1, the screening methodology did not appear to include any screening related impacts on the water supply. Two of the identified routes (C and D) appear to impact our CAVSARP/SAVSARP facilities which are the main sources of the Tucson Active Management Area (AMA). Additionally, all figures showing routes C and D appear to continue to impact CAVSARP/SAVSARP facilities.

Work along the existing route I-10 through Tucson will impact existing water infrastructure.

Figure A-9 shows a legend color for Tucson Water Recharge Basin and identifies them as environmentally Sensitive Areas, but the map doesn't appear to reflect that. Also, Routes C and D appear to run through the Tucson Water recharge basins.

We appreciate your consideration of our comments.

Sincerely,

Michael J. Ortega, P.E.  
City Manager

cc: Farhad Moghimi, Executive Director, Pima Association of Governments



U.S. Department  
of Transportation  
Federal Highway  
Administration

ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

October 4, 2017

In Reply Refer To:  
999-M(161)S  
I-11, I-19/SR 189 to US 93/SR 89  
TRACS No. 999 SW 0 M5180 01P  
Draft Alternatives Selection Report  
I-11 Corridor Tier 1 EIS

Dear Cooperating and Participating Agencies,

The Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) have conducted an analysis of alternatives for the I-11 Corridor, and prepared an Alternatives Selection Report (ASR) to document this phase. The purpose of the ASR process is to determine the alternatives that will be carried forward into the Tier 1 Environmental Impact Statement (EIS) for programmatic-level environmental review in accordance with the National Environmental Policy Act (NEPA) and other regulatory requirements.

With this letter, we are submitting the draft ASR for your review and input. A number of previous documents have provided the foundation for the ASR. The premise for developing and screening alternatives is to meet the Purpose and Need for the project, as outlined in the February 2017 *Purpose and Need Memorandum*. At the onset of the NEPA process, the scoping process engaged public, agency, and tribal input on the Purpose and Need and the range of alternatives and issues to be considered, as documented in the January 2017 *Scoping Summary Report*. The ASR was prepared based on the *Alternatives Selection Report (ASR) Evaluation Methodology and Criteria Report*, which outlined the overall approach for developing, evaluating, and screening corridor alternatives for the I-11 Corridor during the ASR phase. All of these documents have been subject to prior reviews by the Cooperating and Participating Agencies and are available on the ADOT web site at [www.i11study.com/Arizona/Documents.asp](http://www.i11study.com/Arizona/Documents.asp).

As part of the ASR process, meetings were conducted with the public, agencies, and tribes to solicit additional input on the alternatives in April through June, 2017. The draft *Agency and Public Meeting Summary Report* documents the input received during this period, and is also available for your information and review.

In your role as a Cooperating Agency or Participating Agency in this environmental review process, we would appreciate your review of the linked Reports and respectfully request that you provide any written comments to the points of contact below within 30 days of the date of this letter so that we may address any needed modifications.

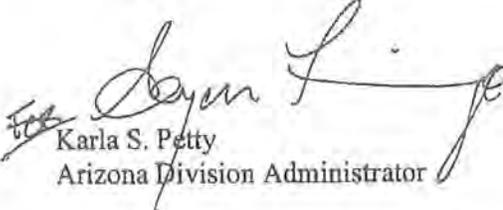
The electronic files are very large and cannot be transmitted via email. Please use this temporary link <https://we.tl/wpHtukl826> to download your own copy of the files; the link will only be active for a month. If you have trouble accessing the files, please alert the project team so we can provide you with alternative delivery options (alternate ftp location, or CD via mail).

Some agencies have shown interest or have a need for shapefiles. Please advise the project team if you would like for those to be provided directly to you via email.

The project team is also available to meet with individual Cooperating or Participating agencies regarding specific questions on the alternatives or ASR process.

If you have any questions or would like additional information, please contact Rebecca Yedlin at 602-382-8979 or [Rebecca.yedlin@dot.gov](mailto:Rebecca.yedlin@dot.gov) or Jay Van Echo at 520-400-6207 or [JVanEcho@azdot.gov](mailto:JVanEcho@azdot.gov). Thank you for your continued cooperation and interest in the I-11 Corridor Tier 1 EIS.

Sincerely,



Karla S. Petty  
Arizona Division Administrator

ecc:

Rebecca Yedlin, FHWA Environmental Coordinator  
Aryan Lirange, FHWA Senior Urban Engineer  
Jay Van Echo, ADOT Project Manager, MD T100  
Jennifer Pyne, AECOM Consultant Team Project Manager



U.S. Department  
of Transportation  
Federal Highway  
Administration

ARIZONA DIVISION

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October 4, 2017

In Reply Refer To:  
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I-11, I-19/SR 189 to US 93/SR 89  
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Draft Alternatives Selection Report  
I-11 Corridor Tier 1 EIS

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March 17, 2017

Rebecca Yedlin  
Environmental Coordinator  
Federal Highway Administration  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012

RE: 999-M(161)S  
I-11, I-19/SR 189 to US 93/SR 89  
TRACS No. 999 SW 0 M5180 01P  
I-11 Corridor Tier 1 EIS  
Evaluation Methodology and Criteria for Alternatives Selection

Dear Ms. Yedlin,

Thank you for the opportunity for the City of Tucson to review and comment on the Draft *Evaluation Methodology and Criteria for Alternatives Selection* for the Tier 1 Environmental Impact Statement (EIS) for the I-11 Corridor.

The City of Tucson requests the opportunity to meet with project staff from FHWA, ADOT, and AECOM this month to discuss in detail the Alternatives Selection Methodology, prior to your finalization of the methodology and criteria.

In general, the City seeks to ensure that the criteria and methodology:

- do not inherently favor routes through vacant lands over those along existing freeways;
- address the City's serious concerns over impacts to water resources;
- do not minimize the importance of multimodal improvements, including passenger rail;
- explicitly analyze growth induced by the corridor alternatives and related impacts; and
- fully and accurately assess the economic and social impacts of the corridor alternatives.

In addition, the City of Tucson's initial summary comments are as follows, by section:

**2.1.1.2 Agency Scoping Input, 2.1.1.3 Public Scoping Input**

- The South section of the I-11 Corridor Study Area should be more specifically segregated from the Central and North sections when discussing agency and public scoping input as it relates to the prospect of bypassing metropolitan Tucson. The decision to bypass metropolitan Phoenix (in the North and Central segments) has already been made through the *I-11 and Intermountain West Corridor Study (IWCS)*; however the decision for the Tucson area will be made via this EIS process, and should receive substantial and separate consideration. As the draft *Evaluation Methodology and Criteria Report* is currently written, input is summarized across all three sections, the result of which is that input on the South section is not meaningfully characterized.

#### 2.1.1.4 Technical Analysis

- Engineering and Environmental Inputs: The City of Tucson requests the opportunity to review and provide comments on these critical model inputs. Some areas of concern include:
  - Interstates 10 and 19 in the South section may not meet current engineering standards for interstate freeway design. The City needs to be assured that this fact will not inherently disadvantage alternatives that co-locate I-11 with the existing I-10 and I-19 in this area.
  - Figure 2.6 Typical Section for Proposed Interstate Freeway Facility
    - It is not clear how this will be used as a model input, however the potential to bias the model away from existing facilities appears high.
  - The City of Tucson Water's Central and Southern Avra Valley Storage and Recovery Project (CAVSARP and SAVSARP) and their planned expansion areas are not represented in the map of Environmentally Sensitive Areas (page 14), despite the fact that these facilities represent the primary renewable water supply available to the entire Tucson metro region and \$250 million in existing public investment. The location of such facilities is subject to its own engineering and environmental constraints, and moving or replacing them is probably not feasible. These facilities should be incorporated both in the Environmentally Sensitive Areas map and within the Environmental and Engineering Inputs.
  - The Environmentally Sensitive Areas (14) and Environmental Inputs also should (do not currently) include City of Tucson Water properties in the Avra Valley, which are variously subject to:
    - The City of Tucson's Avra Valley Habitat Conservation Plan (HCP). The HCP is currently under review by the U.S. Fish and Wildlife Service for a Section 10 Permit under the Endangered Species Act.
    - Restrictive covenants unrelated to the HCP.
    - 100-year leases to Tucson Audubon Society for conservation purposes.These properties are also statutorily connected with water rights essential to the City of Tucson Water system, which provides potable water for the vast majority of metropolitan Tucson.
    - City staff provided ADOT I-11 project staff with this information, as well as documents and GIS files related to CAVSARP, SAVSARP, and the Avra Valley HCP and properties in summer of 2016.
- Density Analysis for Potential Corridor Alternatives : This paragraph must elaborate on how all routes will be modeled. A model methodology based on avoidance of obstacles may be too simplistic and inherently bias route evaluation toward vacant lands.

#### 2.1.1.5 Optimization of Corridor Alternatives

- More information is needed here about how routes will be "optimized."

### 2.1.2 Initial Range of Corridor Alternatives

- More information is needed here regarding how the comparison will be done (i.e. quantitative, qualitative), and how this will impact the range of corridor alternatives to be evaluated.

### 2.2.1 Evaluation Criteria and Table 2-1 Evaluation Criteria and Measures

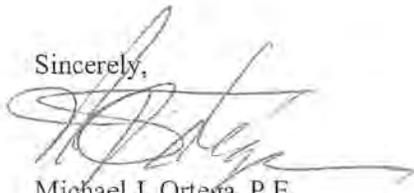
- Address Population and Employment Growth: criteria and measures should be added that address the potential for corridor alternatives to induce growth in new, previously undeveloped areas. Induced growth may address the project's ability to meet the project's purpose to "support improved regional mobility..." and to "...support economic vitality" in existing metropolitan areas. Induced growth will also create indirect environmental impacts to the Sensitive Environmental Resources listed, which should be evaluated. A Growth-related, Indirect Impact Analysis of some corridor alternatives may be necessary, and should be conducted early in the EIS process (e.g., see *Guidance for Preparers of Growth-related, Indirect Impact Analyses*, Caltrans 2006).
- Mitigate Congestion and Improve Travel Times:
  - All measurements should account for the potential to add additional, segregated, limited access "express"-style lanes along existing freeway corridors in urban areas. How each corridor alternative is designed and managed will impact all of the criteria and measures within this category, and must be addressed.
  - A criteria and measures should be added for the ability of the corridor alternatives to facilitate passenger transit service. This will ultimately impact all of the criteria and measures within this category, and must be addressed.
- Improve Access to Economic Activity Centers:
  - The "Number of...activity centers" measure is ill-defined, and subject to a high level of subjectivity and manipulation. This measure should be re-defined in a more specific and meaningful way.
  - The "Additional population within a 45-minute drive time" measure is too broad, and would seem to draw very little distinction between the various corridors within the overall study area.
- Support Homeland Security and National Defense: urban areas should be separated from rural areas in this evaluation, and the evaluation measure should say "Provides alternate interstate freeway or urban arterial route." The measure should also not be a simple "yes" or "no."
- Minimize Direct Impacts on Sensitive Environmental Resources: a criteria and measures regarding impacts to water resources should be added.

To: Rebecca Yedlin  
Date: March 17, 2017  
Page 4 of 4

- “Other information to be considered” (page 19): the weight of these significant factors (Plan Consistency, Implementation of Corridor Typical Section, Agency Input, Public Input) relative to the Evaluation Criteria and Measures detailed in Table 2-1 needs to be clarified. For instance, they are not mentioned in the following section 2.2.2 Evaluation Approach, Evaluation of Corridor Options.

This letter includes initial comments from the City, which will be best addressed by meeting in person. Please contact my staff (James MacAdam, 520-837-4068, [James.MacAdam@tucsonaz.gov](mailto:James.MacAdam@tucsonaz.gov)) to arrange a time when City staff may discuss these comments with your project team.

Sincerely,



Michael J. Ortega, P.E.  
City Manager

cc: Honorable Mayor and Council Members  
Joyce Garland, Chief Financial Officer and Assistant City Manager  
Albert Elias, Assistant City Manager  
Manjeet Ranu, Director, Planning and Development Services  
Timothy Thomure, Director, Tucson Water  
Daryl Cole, Director, Tucson Department of Transportation  
Andrew Greenhill, Manager, Intergovernmental Affairs  
Karen Fogas, Executive Director, Tucson Audubon  
Farhad Moghimi, Executive Director, Pima Association of Governments



CITY OF  
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May 5, 2017

Jay Van Echo  
ADOT I-11 Study Manager  
Arizona Department of Transportation  
Sent via electronic mail

RE: 999-M(161)S  
I-11, I-19/SR 189 to US 93/SR 89  
TRACS No. 999 SW 0 M5180 01P  
I-11 Corridor Tier 1 EIS  
Evaluation Methodology and Criteria for Alternatives Selection

Dear Jay,

Thank you for meeting with City of Tucson staff on April 3, 2017 regarding the City's comments on the *Evaluation Methodology and Criteria for Alternatives Selection*. As a follow-up to one of the items discussed in that meeting, we are providing detailed information on City of Tucson Water properties and facilities within the Avra Valley. This will be pertinent to your considerations, as Corridor Options C and D (as identified at <http://www.i11comment.com/Home/Map>) would both appear to directly and substantially impact these properties and facilities. The following information is provided via numbered electronic pdf documents attached to this communication:

- Solar Farm Lease (1, 1a, 1b)
- Solar Farm Lease
- Farm Water Rights
- Habitat Conservation Plan (4, 4a, 4b, 4c, 4d, 4e)
- CAVSARP Section 7 Permit (5, 5a, 5b, 5c, 5d)
- CAVSARP Map
- SAVSARP Map
- CAVSARP/SAVSARP Capital and Operating cost
- Phoenix Inter AMA agreement (9, 9a)
- Audubon Agreements (10, 10a)

You should receive 23 documents. In addition, as a courtesy we are also re-sending maps and GIS shape files associated with these properties, which were provided to the ADOT I-11 project team in summer of 2016.

To: Jay Van Echo  
Date: March 17, 2017  
Page 2 of 2

Please note that these files will be sent in three separate emails. Do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' and 'M' followed by a long horizontal line.

James MacAdam  
Project Manager

cc: Michael J. Ortega, City Manager  
Joyce Garland, Chief Financial Officer and Assistant City Manager  
Albert Elias, Assistant City Manager  
Lynne Birkinbine, Deputy Director, Planning and Development Services  
Timothy Thomure, Director, Tucson Water  
Daryl Cole, Director, Tucson Department of Transportation  
Andrew Greenhill, Manager, Intergovernmental Affairs  
Farhad Moghimi, Executive Director, Pima Association of Governments  
Jennifer Pyne, I-11 Project Team, AECOM



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December 23, 2016

Rebecca Yedlin  
Environmental Coordinator  
Federal Highway Administration  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012

RE: 999-M(161)S  
I-11, I-19/SR 189 to US 93/SR 89  
TRACS No. 999 SW 0 M5180 01P  
I-11 Corridor Tier 1 EIS  
Draft Purpose and Need Memorandum

Dear Ms. Yedlin,

Thank you for the opportunity for the City of Tucson to review and comment on the Draft *Purpose and Need Memorandum* for the Tier 1 Environmental Impact Statement (EIS) for the I-11 Corridor. The City's comments are as follows:

- (Section 4.1 Alternatives Selection Report, page 37) The City of Tucson requests that impacts to water supply be included among the evaluation and screening criteria of the Alternatives Selection Report (ASR). We understand that the City will have the opportunity to review the ASR methodology and criteria at a later date, but wish to emphasize the importance of this factor, given its outsized economic and environmental significance in our arid region.
- (Section 4.3 Final Tier 1 EIS and Record of Decision, page 38) We request that explicit clarification be provided in the document that Build Alternatives would not necessarily require a 2,000-foot-wide "clear zone" or right of way; and that the proposed interstate freeway facility and its related corridor could be narrower in areas that are constrained by natural or man-made factors.

As these comments suggest, it is my expectation that this EIS will evaluate a Build Alternative that includes co-location of the I-11 with I-10 and I-19 through the Tucson metro region. This co-location Build Alternative must be considered on equal footing to other alternatives, without pre-established limitations, such as a requirement for a 2,000-foot clear corridor.

Sincerely,

Michael J. Ortega, P.E.  
City Manager

cc: Farhad Moghimi, Executive Director, Pima Association of Governments



July 8, 2016

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Mr. Aryan Lirange, Senior Urban Engineer  
Federal Highway Administration  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012

RE:  
999-M(161)S  
I-11, I-19/SR 189 to US 93/SR 89  
TRACS No. 999 SW 0 M5180 01P  
I-11 Corridor Tier 1 EIS  
Participating Agency Invitation Letter

Dear Mr. Lirange,

The City of Tucson will serve as a Participating Agency during the Tier 1 EIS process for the I-11 Corridor. City staff participated in the Agency Scoping Meeting of Wednesday, June 22 at Pima Association of Governments in Tucson.

At this time, the City's comments on the Scope pertain to the alternatives to be studied and impacts to be evaluated. To provide additional context, relevant policies are cited from *Plan Tucson: City of Tucson General and Sustainability Plan*, which was ratified by voters in 2013. The comments provided in this letter should not be construed as a policy position on the I-11 project or EIS process. Rather, they are provided as information to be considered in your analysis. City staff will discuss the I-11 project with Mayor and Council at the appropriate time in the future; and they may choose to direct staff to submit additional comments at that time.

### **Consideration of Alternatives**

Related Plan Tucson policy:

*Policy LT22:* Participate in efforts to develop a coordinated regional, multi-modal transportation system that improves the efficiency, safety, and reliability of transporting people and goods within the region and to destinations outside the region (*Built Environment Focus Area: Land Use, Transportation, & Urban Design Element*).

The City requests that the Tier 1 EIS consider innovative approaches to alternatives that locate I-11 approximately within the existing rights of way for I-10 and I-19 (including frontage roads). Developing the interstate within already disturbed areas has the potential to have fewer impacts to natural resources, lower cost, easier access to I-10 East for both freight and passenger travelers, and shorter routes to already developed freight hubs along I-10 and I-19. Any alternatives along existing facilities in the urban area need to study a smaller than 2,000' wide study area, using a reasonable width of dual designated highway.

One such innovative approach is detailed in the collector-distributor roadway alternative (System Alternative IV) as described in the ADOT/FHWA *Interstate 10: Junction Interstate 19 to State Route 83/State Route 210: Golf Links Road to I-10 Feasibility Report Update* completed in February 2015. This approach separates local and through traffic, and has the potential to greatly facilitate freight movement without adding as much physical infrastructure (i.e. lanes) as would otherwise be required. A collector-distributor roadway would also provide a consistent approach along I-10 through the city if that alternative is selected on the eastern portion of the urban area along I-10.

### **Potential Economic Impacts**

Related Plan Tucson policies:

Policy RGI: Increase international partnerships and trade opportunities, with particular focus on Tucson's strong economic, cultural, and geographic ties to Mexico (*Economic Environment Focus Area: Regional & Global Positioning Element*).

Policy RG2: Capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics (*Economic Environment Focus Area: Regional & Global Positioning Element*).

Policy LT22: Participate in efforts to develop a coordinated regional, multi-modal transportation system that improves the efficiency, safety, and reliability of transporting people and goods within the region and to destinations outside the region (*Built Environment Focus Area: Land Use, Transportation, & Urban Design Element*).

Policy TQ2: Preserve and celebrate the beauty of Tucson's natural landscape and the wonder of the Sonoran Desert (*Social Environment Focus Area: Tourism & Quality of Life Element*).

To: Mr. Aryan Lirange

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While the overall economic impact of any roadway alternative would need to be verified by a formal economic impact study, the initial economic development impact of I-11 (any alternative) to the City of Tucson would be the creation of construction jobs and businesses supporting the construction industry. I-11 would further support efforts of the Port of Tucson to continue to build its inland port services. This would further position Tucson as a major logistics center in the Southwest, allowing Tucson to be more competitive in the global economy.

For roadway alternatives that skirt or bypass the majority of the Tucson metro area, there are pros and cons to consider. Potential negative impacts to the City include loss of sales tax revenue from frontage hotels, restaurants and gas stations that cater to the trucking industry. However, the types of businesses typically associated with the trucking industry are retail and basic service industry related jobs, which tend to have low wages with limited positive spinoffs. As further due diligence, the City can undertake an analysis of the sales tax generated from businesses ¼-mile on either side of I-10 from Kolb Road to Ruthrauff Road to fully understand the extent of the revenue impact.

Additionally, there could be substantial loss of revenue from domestic and Mexican visitors who would then have an option to bypass the City of Tucson. Currently, visitors from Mexico spend nearly \$1 billion in Tucson and Pima County each year. This accounts for more than 5% of the total taxable sales in Pima County, the majority of which occurs within the City of Tucson.

Also, roadway alternatives that pass through undeveloped or rural areas would have the potential to affect tourism, a large portion of which is driven by the region's unique natural assets such as plants and wildlife, scenic views, natural quiet, and dark skies. Conversely, studies show that a decrease in urban truck traffic could also improve the quality of life of existing Tucson residents and assist in further downtown redevelopment.

For roadway alternatives using the existing I-10/I-19 rights of way, the inverse would be true. Mexican and domestic visitors would not have the option to bypass Tucson and would continue to visit Tucson for shopping and leisure services. The frontage hotels, restaurants, retailer and gas stations along the interstate would see an increase in sales corresponding to the increase in truck traffic. Additionally, an increase in traffic could cause congestion, increased pollution and ambient noise for the neighborhoods immediately surrounding the interstate.

## **Potential Social Impacts**

Related Plan Tucson Policy:

*Policy LTI:* Integrate land use, transportation, and urban design to achieve an urban form that supports more effective use of resources, mobility options, more aesthetically-pleasing and active public spaces, and sensitivity to historic and natural resources and neighborhood character (*Built Environment Focus Area: Land Use, Transportation, & Urban Design Element*).

Potential impacts to neighborhoods adjacent to proposed roadway alternatives (noise, air pollution, etc.) need to be evaluated. It should be noted that many neighborhoods along the existing alignments of I-10 and I-19 already experience high stress levels (based on *City of Tucson Indicators of Neighborhood Stress*, 2016).

## **Potential Impacts to Tucson Water Properties in Avra Valley**

Related Plan Tucson Policies:

*Policy WR1:* Continue to plan and manage the City's water supplies, quality, and infrastructure for long-term reliability and efficiency (*Natural Environment Focus Area: Water Resources Element*).

*Policy WR5:* Protect groundwater, surface water, and stormwater from contamination (*Natural Environment Focus Area: Water Resources Element*).

*Policy WR6:* Integrate land use and water resources planning (*Natural Environment Focus Area: Water Resources Element*).

*Policy WR7:* Collaborate on multi-jurisdictional and regional water planning and conservation efforts (*Natural Environment Focus Area: Water Resources Element*).

*Policy WR10:* Continue to manage the City's Water Service Area, considering service area expansion only when it furthers the long-term social, economic, and environmental interest of City residents (*Natural Environment Focus Area: Water Resources Element*).

Any alternatives that are studied that traverse the Avra Valley will need to consider impacts to City-owned (Tucson Water) water facilities in the area. These facilities are depicted in the attached map, and include both the Central and Southern Avra Valley

To: Mr. Aryan Lirange

Date: July 8, 2016

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Storage and Recovery Project (CAVSARP and SAVSARP). These water facilities (collectively referred to as “Clearwater”) represent the primary source of Tucson’s renewable water supply.

Alignment through Clearwater could present significant challenges to the utility’s operations, and there could be significant costs in the event that Tucson Water infrastructure was required to be moved in order to make way for a new Interstate. Recharge basins, wells, transmission lines, and more have cost the utility’s ratepayers over \$250 million, and the timeframe for their development, including studies, permitting, and construction, takes many years. It is unclear at this time what the costs and timelines would be for moving infrastructure to alternate locations.

In addition, the current location of the project, including both CAVSARP and SAVSARP, was selected because of the hydro-geological advantages of the area. It is unknown at this time whether—and if feasible, where—replacement infrastructure could be relocated under similar conditions as those that exist in the present location. Any reduction in Tucson Water’s recharge and recovery capacity in the area could increase our dependence on non-renewable groundwater supplies to meet customer demand.

Other considerations include:

- **Habitat Conservation Plan (HCP):** For almost a decade, Tucson Water has worked with the U.S. Fish and Wildlife Service in order to secure a Section 10 permit for all Tucson Water properties in Avra Valley. Tucson Water strongly recommends that any new development in the area comply with our Section 10 permit.
- **Water quality concerns:** Locating an Interstate Highway in close proximity to Tucson’s drinking water supply must account for potential introduction of incompatible land uses and activities in the area such as land development, gas stations, and the movement of hazardous materials.
- **Tucson-Phoenix water exchange:** Current plans include the expansion of recharge operations at CAVSARP and SAVSARP to accommodate the increased storage of City of Phoenix (and potentially other municipal partners’) water in our facilities. Any reduction of current recharge capacity—or limitations on future recharge basin construction and recharge capacity—by a new Interstate could reduce or eliminate Tucson’s ability to fulfill its obligations under the proposed agreement.

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Date: July 8, 2016

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- Water rights: Tucson Water purchased these retired farm properties in Avra Valley for their water rights. Due to the nexus between land ownership and water rights, sale and/or lease of the properties can complicate Tucson's water rights in the area.
- Restrictive covenants: Separate from the HCP, portions of Clearwater are limited by permanent restrictive covenants, tied to the deed, that apply to both current and future owners of the land. These covenants restrict both the ability to route an Interstate through Clearwater, as well as Tucson Water's ability to relocate infrastructure.

City staff is available to provide further information to the I-11 Project Team as needed. Specifically, we would like to request an in-person consultation between City staff and I-11 Project Team members to address any questions you might have, and to provide further detail if needed. James MacAdam (James.MacAdam@tucsonaz.gov, 520-837-4068) in the City Manager's Office will serve as the City's point of contact on this project.

Sincerely,

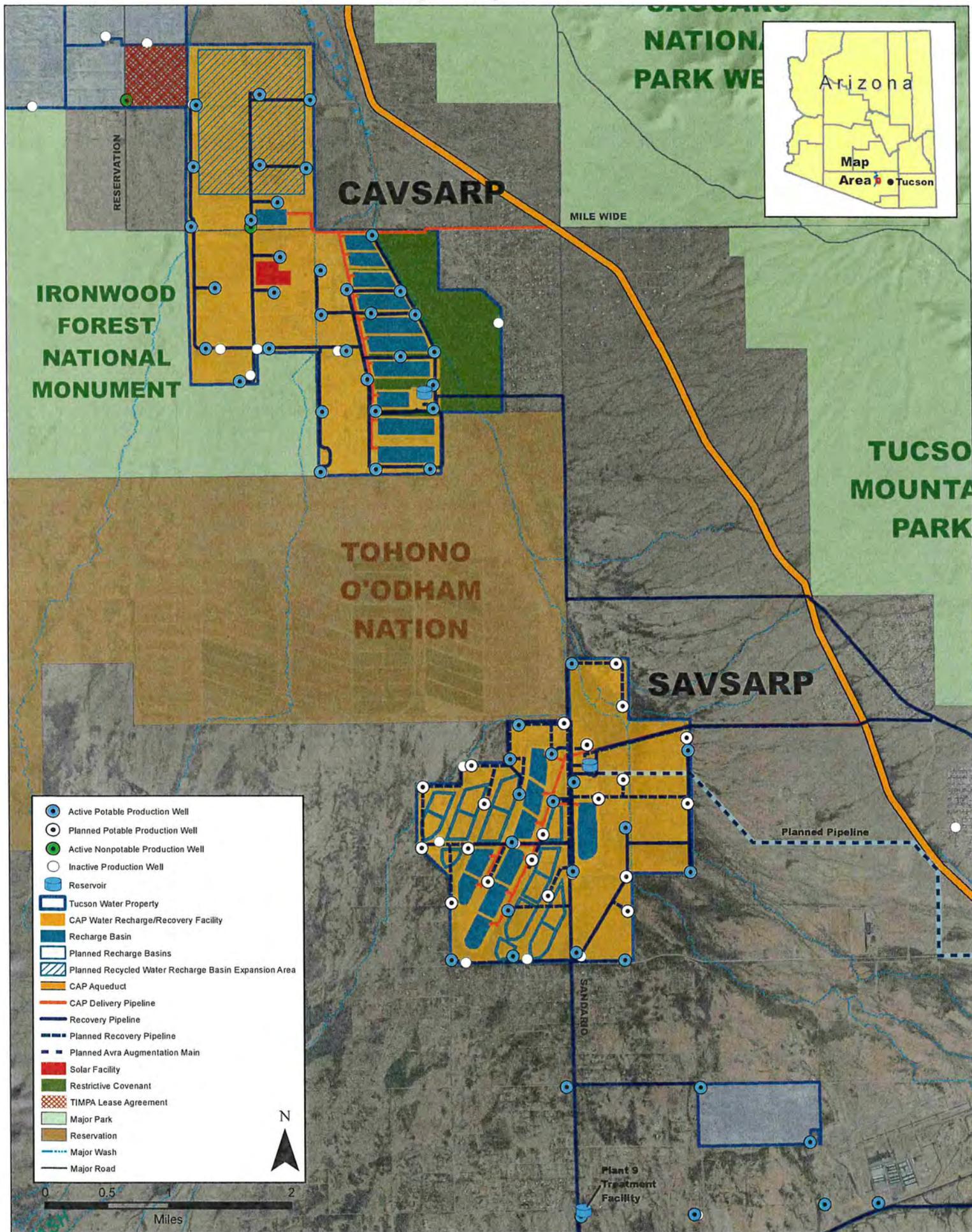


Michael J. Ortega, P.E.  
City Manager

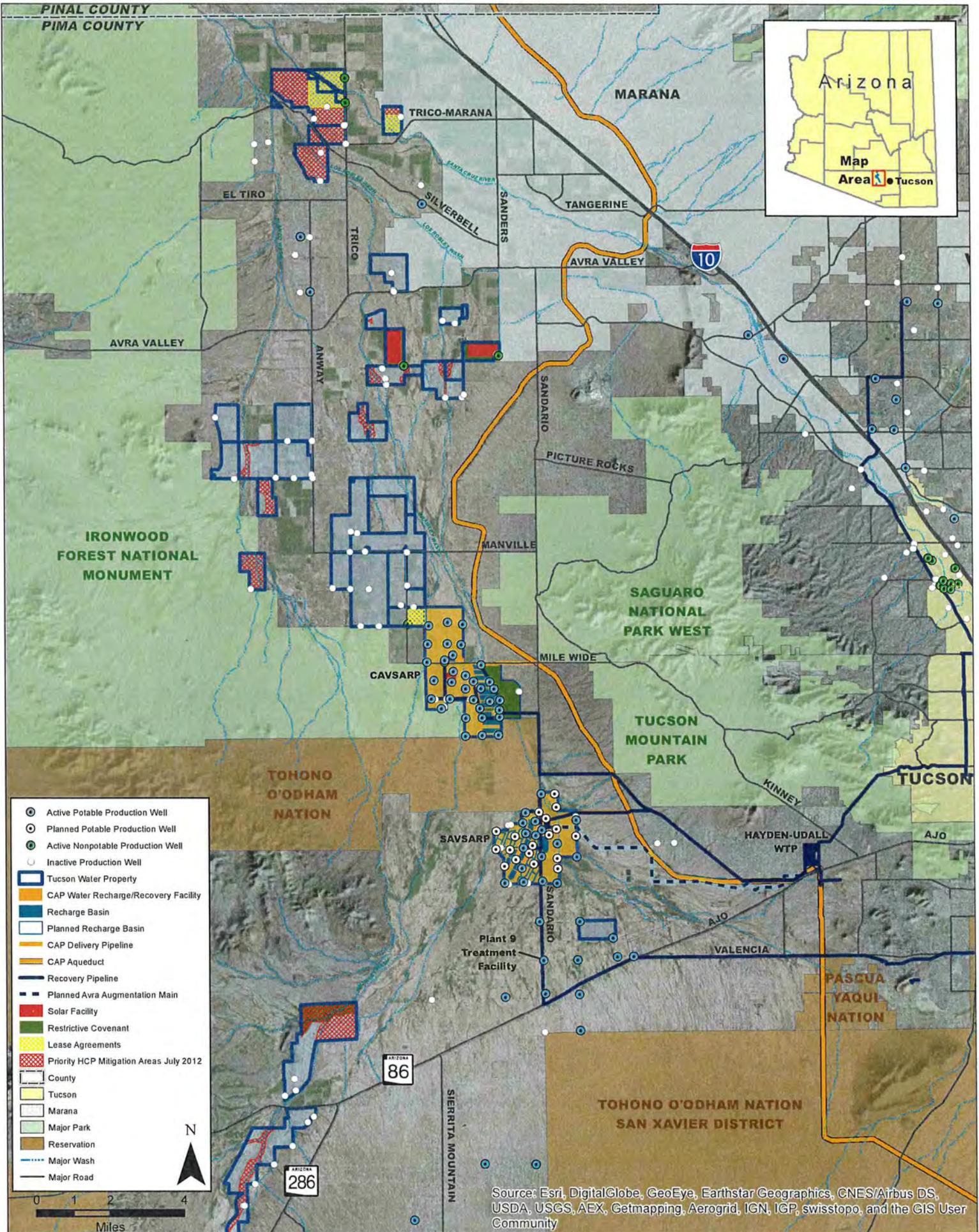
Attachments: Map of Tucson Water Avra Valley Recharge Projects  
Map of Tucson Water Avra Valley Property

cc: Farhad Moghimi, Executive Director, Pima Association of Governments  
Albert Elias, Assistant City Manager  
Joyce Garland, Assistant City Manager  
Timothy Thomure, Director, Tucson Water  
Daryl Cole, Director, Tucson Department of Transportation  
Nicole Ewing-Gavin, Interim Director, Planning and Development Services  
Department  
Greg Jackson, Management Coordinator, Economic Initiatives Office

# Tucson Water Avra Valley Recharge Projects



# Tucson Water Retired Avra Valley Farm Property





U.S. Department  
of Transportation  
**Federal Highway  
Administration**

**ARIZONA DIVISION**

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

April 26, 2019

In Reply Refer To:

999-M(161)  
TRACS No. 999 SW 0 M5180 01P  
I-11, I-19/SR 189 to US 93/SR 89  
I-11 Corridor Draft Tier 1 EIS  
Notice of Errata to the Draft Tier 1 EIS Availability

Mr. Michael Ortega, City Manager  
City of Tucson  
255 West Alameda  
10th Floor  
Tucson, Arizona 85701

SENT VIA E-MAIL TO [citymanager@tucsonaz.gov](mailto:citymanager@tucsonaz.gov)

Dear Mr. Ortega:

On April 5, 2019, FHWA published a notice of availability for its Draft Environmental Impact Statement and Preliminary Section 4(f) Evaluation (DEIS) for the Interstate 11 Corridor between Nogales and Wickenburg, AZ (I-11) project (84 FR 13662). On April 17, 2019, the Arizona Department of Transportation (ADOT) notified FHWA that a section of the DEIS was not included in the document. Based on this, FHWA, in conjunction with ADOT, has published this availability notice in the Federal Register and prepared an Errata to the DEIS and will provide an extension to the review and comment period to **July 8, 2019**.

The Errata to the Draft Tier 1 EIS is available online at:

<http://i11study.com/Arizona/Documents.asp>

In your role as a Participating Agency in this environmental review process, we request review of the Errata to the Draft Tier 1 EIS and written comments by the extended comment period end date of **July 8, 2019**. Please submit comments to:

Email: [I-11ADOTStudy@hdrinc.com](mailto:I-11ADOTStudy@hdrinc.com)  
Mail: I-11 Tier 1 EIS Study Team  
c/o ADOT Communications  
1655 West Jackson Street  
Mail Drop 126F  
Phoenix, AZ 85007

There has been no change to times, dates, and locations of the six scheduled public hearings during the public comment period. Public comment period instructions as well as public hearing dates and times will be posted on the project website ([i11study.com/Arizona](http://i11study.com/Arizona)) and are summarized in the enclosure.

For further questions about document access, the comment period extension, or additional information, please contact: Rebecca Yedlin, FHWA Environmental Coordinator at 602-382-8979 or [Rebecca.Yedlin@dot.gov](mailto:Rebecca.Yedlin@dot.gov) or Jay Van Echo, ADOT Project Manager at 520-388-4224 or [JVanEcho@azdot.gov](mailto:JVanEcho@azdot.gov).

Thank you for your continued cooperation and interest in the I-11 Corridor Tier 1 EIS.

Sincerely,

A handwritten signature in blue ink, appearing to read "Karla S. Petty". The signature is fluid and cursive, with a small "for" written to the left of the main name.

Karla S. Petty  
Division Administrator

Enclosure

ecc:

Scott Clark, City Managers Office, City of Tucson ([scott.clark@tucsonaz.gov](mailto:scott.clark@tucsonaz.gov))  
Diane Alarcon, Tucson Department of Transportation ([diana.alarcon@tucsonaz.gov](mailto:diana.alarcon@tucsonaz.gov))  
Robin Raine, Tucson Department of Transportation ([robin.raine@tucsonaz.gov](mailto:robin.raine@tucsonaz.gov))  
Shellie Ginn, Tucson Department of Transportation ([shellie.ginn@tucsonaz.gov](mailto:shellie.ginn@tucsonaz.gov))  
Anna Steiner, Tucson Department of Transportation ([anna.steiner@tucsonaz.gov](mailto:anna.steiner@tucsonaz.gov))  
Ryan Tripp, Real Estate Division, City of Tucson ([Ryan.Tripp@tucsonaz.gov](mailto:Ryan.Tripp@tucsonaz.gov))  
Laynee Jones, AECOM  
RYedlin  
ALirange  
JVanEcho

Mayor and Council Study Session - 6/18/2019  
Arizona Department of Transportation (ADOT) I-11 Draft Tier 1  
Environmental Impact Statement (EIS)(City Wide)SS/JUN18-19-134

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**OFFICIAL MEMBERS PRESENT:**

- Mayor Jonathan Rothschild, Chairperson
- Council Member Regina Romero (Ward 1)
- Council Member Paul Cunningham (Ward 2)
- Council Member Paul Durham (Ward 3)
- Council Member Shirley Scott (Ward 4)
- Council Member Richard G. Fimbres (Ward 5)
- Council Member Steve Kozachik (Ward 6)

**OFFICIAL MEMBERS**

**ABSENT/EXCUSED:** None

**STAFF PRESENT:**

- Michael J. Ortega, City Manager
- Michael Rankin, City Attorney
- Roger Randolph, City Clerk

**LOCATION:**

Mayor and Council Chambers  
City Hall  
255 West Alameda Street  
Tucson, Arizona

\*\*\*\*\*

1                   MAYOR ROTHSCHILD: Let's move on to Item 8,  
2 Arizona Department of Transportation I-11 Draft Environmental  
3 Impact Statement; scheduled for 40 minutes. Staff from the  
4 Arizona Department of Transportation has a presentation on the I-  
5 11 Draft Tier 1 Environmental Impact Statement Study and  
6 Recommended Alternatives. Mr. Manager?

7                   MR. ORTEGA: Mr. Mayor, Members of the Council,  
8 this is an opportunity to hear directly from some ADOT  
9 representative -- I believe Greg Byers is here; he's going to  
10 make a presentation.

11                   So you have been copied on many of the correspondence  
12 -- and pieces have gone back and forth -- particularly our  
13 comments on the I-11 Corridor Analysis and Study as we've had the

1 opportunity to comment on that. As we received a copy of the  
2 EIS, the draft EIS, what I suggested is that ADOT come before  
3 you, have a conversation, give you an opportunity to weigh in.  
4 In the materials, I did provide you with a draft of -- of my  
5 letter to ADOT which I plan to send after this; assuming that you  
6 give me the nod to do that. But I did think it was important for  
7 ADOT to have an opportunity to outline for you some of the -- the  
8 thoughts that they have on this, as well as, you know, maybe  
9 outline for you what the next steps might be.

10 So, with that, I'll turn it over to Greg.

11 MR. BYERS: Thank you, Mr. Mayor, Councilors. I  
12 have a short presentation that we'll kind of go through. What  
13 we're covering here is what's called the Tier -- Draft Tier 1  
14 Environmental Study. And let me kind of go through this real  
15 quick on what that actually means.

16 So, in the National Environmental Policy Act, the  
17 policy gives us the opportunity to do what's called a Tier 1 out  
18 of, basically, two tiers; to do some preliminary planning on  
19 projects without having full funding for that project. That's  
20 extremely important to understand because without having to have  
21 a full appropriation for a project -- and, in this case, if the  
22 full project was to be built, we're talking about billions of  
23 dollars -- there's no way in the world that we could do that  
24 under physical constraint. So that's what brings this about.

25 And this is -- the Tier 1 is the highest level, the

1 most preliminary, that we can possibly do; it does not get into  
2 project-level details; it does not get down to the nitty-gritty,  
3 this is extremely high-level; so that's very important to  
4 understand as we go forward in the presentation.

5           So, as part of the background in the study area, what  
6 we're looking at here is this is the I-10 Intermountain West  
7 Corridor which was actually completed -- that study was completed  
8 back in 2014. This goes for 280 miles; it goes from Nogales to  
9 Wickenburg. From Wickenburg north to the state line with Nevada,  
10 that route, SR -- the U.S. 93, has already been designated as the  
11 future I-11; so that was done by Congress back, I believe, six  
12 years ago. So one of the other things is this actually goes  
13 through five different counties: It goes through Santa Cruz  
14 County, Pima County, Pinal County, Maricopa County, and Yavapai  
15 County.

16           So, in the Tier 1, what we're looking for here is we're  
17 trying to designate a 2,000-foot-wide corridor. We're talking  
18 about extremely wide, roughly -- not quite a half-mile-wide  
19 corridor that we can possibly put a freeway in, so -- or a  
20 roadway of some type. Okay? I'm not saying -- I -- I want to  
21 say a freeway, but we're talking about a roadway of some type.  
22 Ultimately, what we're probably talking about is about a 400-  
23 foot-wide right-of-way swath that's going to occur somewhere  
24 within that 2,000 feet. So this gives us the ability to try and  
25 look at as much impact as we possibly can. We're not looking at

1 the least impact, we're looking at almost the most impact that  
2 can occur within that 2,000 feet.

3 And so the people who put this together, there's two  
4 lead agencies, and that's ADOT as well the Federal Highway  
5 Association -- or Administration. We have ten cooperating  
6 agencies. The cooperating agencies are basically all the federal  
7 agencies. We have one state agency that's a cooperating agency  
8 here and that is Game and Fish.

9 We have 51 participating agencies. City of Tucson is a  
10 participating agency, along with other cities, counties -- let's  
11 see, city (sic), counties, state agencies, other federal  
12 agencies, as well as tribal agencies.

13 And then, of course, we have 92 consulting parties that  
14 have gone into putting together the document that we currently  
15 have put out for public review.

16 So the purpose and need for the -- this document  
17 itself, there's -- there's several items that we have to  
18 consider. One is population and -- and employment growth. We  
19 have traffic growth and travel time reliability. We have access  
20 to economics and the activity centers as well as system linkages  
21 and regional mobility and Homeland Security and National Defense.  
22 That last one is necessary because, again, that's built in to  
23 part of our NIFA requirements that we go through.

24 Alternatives identified are based on prior studies,  
25 like I said, we had the Intermountain West Corridor Study that we

1 looked at; agency and public input, which we are currently in the  
2 input phase; right now we're looking for public comments. Tribal  
3 coordination. We've been working with several tribes as we go  
4 through putting this together, as well as the technical analysis  
5 that comes from cultural, biological, and so forth, as we go  
6 through all of the NIFA requirements.

7 Common themes. We stay consistent with local regional  
8 plans and other projects. We foster economic development,  
9 protect environmental sensitivity resources, consider wildlife  
10 connectivity as well as consider co-locating existing  
11 transportation routes with new routes. Yeah, here we go.

12 So the technical analysis on this, we -- we have to go  
13 by interstate design standards because, ultimately, that's  
14 exactly what we're looking for at this point in time. So one of  
15 the other things we have to do is we have to avoid -- and -- and  
16 that's -- that's paramount in this study -- avoid and minimize  
17 impacts to national parks and monuments, wildlife areas, roadless  
18 areas, critical habitats, Section 4(f) properties -- that's  
19 crucial to this area. So those Section 4(f) properties are  
20 public properties that are basically utilized by the public,  
21 tribal lands, 100-year floodplains and floodways, as well as  
22 impacts to existing development.

23 So there's a no-build alternative that's possible that  
24 comes out of this study; but we have to keep in mind with the no-  
25 build alternative that it's not recommended at this point in time

1 because it does not provide access to planned growth areas, it  
2 does not reduce travel time for long-distance traffic, it does  
3 not connect metropolitan areas and markets, does not enhance  
4 access to the existing transportation network to support economic  
5 vitality, and it does not provide alternate regional -- regional  
6 routes for emergency evacuation and defense access.

7           So, as we went through the study, we came up with  
8 actually hundreds of different alternatives. We took and boiled  
9 those alternatives down into three full-length alternatives: So  
10 we have the purple one which is a mix of existing and new  
11 corridor options. We have the green option which is the -- is  
12 primarily new corridor options. And we have an orange option  
13 which is the most -- mostly existing interstate and highway  
14 corridors. So I know that map is very hard to see, but it kind  
15 of gives you an idea of what we're looking at as we went through  
16 that 280-mile stretch.

17           So we came up with a Recommended Corridor Alternative,  
18 and it is a mixture of all three of those alternatives so with  
19 the -- primarily based on the purple and green. This best meets  
20 purpose and need, while reducing the potential for adverse  
21 impacts. So, again, you can see how it routes all the way up  
22 through the entire length of the corridor.

23           As far as a timeline goes, right now we are in a public  
24 comment period. That public comment period stays open until July  
25 8th. We have already gone through a whole series of public

1 hearings. There was an initial set of hearings when we first  
2 started. This second set came out with the Recommended Corridor  
3 Alternative, so we are in the process of bringing all those  
4 comments together. Every single one of those comments must be  
5 addressed as part of the need for process. We have to -- we have  
6 to go through every single one of them. We are expecting  
7 somewhere in the neighborhood of 20,000 comments for this  
8 publication.

9 If you look at this, what we're looking at is trying to  
10 have a record of decision somewhere around mid-2020 is what we're  
11 hoping for. It all depends on how the comments come through, how  
12 we can take and address all those comments, and where they go,  
13 so -- but that's our current timeline on what we're looking at.

14 So I was talking about the public hearings. We just  
15 finished up a whole round of public hearings. We had hearings  
16 down in Buckeye, Wickenburg, Casa Grande, Nogales, here in  
17 Tucson, and also out in Marana, So we have completed all of our  
18 public hearings; however, public comment can still be made.

19 So we have several options for that public comment to  
20 come in. We have -- it can be done online through our  
21 [illstudy.com](http://illstudy.com) website.

22 It can also be done on the phone. Here's the phone  
23 number, that 1-844-544-8049.

24 It can also be done by email through the -- ADOT's  
25 [illadotstudy@hdrinc.com](mailto:illadotstudy@hdrinc.com), or it can be mailed in to I-11 Tier 1

1 EIS Study Team in care of ADOT Communications at 1655 West  
2 Jackson Street, Mail Drop 126F, in Phoenix, Arizona, 85007.  
3 That's all.

4 MAYOR ROTHSCHILD: All right.

5 MR. BYERS: All of the information --

6 MAYOR ROTHSCHILD: Go ahead.

7 MR. BYERS: Okay. All of the information, and the  
8 -- the EIS report itself, can be found on our website. Again,  
9 it's [illstudy.com](http://illstudy.com). You can find all -- it's a 700-page document,  
10 not including the appendices, which are somewhere in the  
11 neighborhood of another 1,500 pages.

12 MAYOR ROTHSCHILD: Okay.

13 MR. BYERS: You can read it all if you want.

14 MAYOR ROTHSCHILD: All right. Well, thank you,  
15 sir, for coming in. We appreciate you coming down.

16 I think the Council's concern was since the July 8th  
17 deadline's coming up -- and they wanted to have a collective  
18 thought to you -- and I think putting it in the context that  
19 we're really in the stage one of the Tier 1, with 20,000 comments  
20 to review, and with any luck, a potential final recommended  
21 corridor a year from now --

22 MR. BYERS: Right.

23 MAYOR ROTHSCHILD: -- but, that being said, I'm  
24 looking at your -- your criteria, and it says, "to avoid  
25 wilderness areas, roadless areas, critical habitats, tribal

1 lands, and impacts to existing developments." When I think of  
2 impacts to existing developments, I'm thinking of our water  
3 infrastructure that supports this entire region's water. And so  
4 I think there's concern amongst this body about why areas were  
5 chosen -- a route was chosen --en though it's not the final route  
6 -- when that's out there.

7 Now, before I turn over to Council, I do want to point  
8 out that our City Manager, I think -- and I'm hoping if you could  
9 confirm -- that those comments will also be part of the record.  
10 In July, 2016, Mr. Ortega submitted comments to FHWA on the scope  
11 of the Tier 1 EIS process explicitly calling the agency's  
12 attention to the need to protect Tucson Water's CAVSARP, SAVSARP  
13 facilities, so that'll be part of the record?

14 MR. BYERS: Yes, sir.

15 MAYOR ROTHSCHILD: Okay. In December, 2016, he  
16 submitted comments that recommended evaluating a route that would  
17 collate -- co-locate I-11 and I-10/I-19 through the Tucson Metro  
18 region, giving that route equal consideration with other  
19 alternatives.

20 In March, 2017, he requested a meeting, which I'm sure  
21 occurred, that -- and I -- and if this hasn't been documented I  
22 think it will be in what we're doing here today -- to not  
23 inherently favor routes through vacant lands over those along  
24 existing freeways, address the City's concerns over impacts to  
25 water resources, do not minimize the importance of multi-modal

1 improvements, including passenger rail, explicitly analyzing  
2 growth induced by corridor alternatives and related impacts, and  
3 that's a concern to our community, both from building out 30  
4 miles west of our community -- what kind of growth could occur  
5 out there versus the impact it might have on our existing  
6 community -- and so fully and accurately assess the economic and  
7 social impacts of the corridor alternatives. And I know that  
8 that documentation was sent to ADOT regarding CAVSARP and  
9 SAVSARP.

10 So I think -- and, hopefully, everybody will be  
11 reasonable about it, 'cause you're just gathering the information  
12 -- but I -- I -- I can -- I can feel the frustration when we've  
13 provided that information and -- and, yet, we get this kind of  
14 recommendation back.

15 Now, I -- I know it's preliminary, but I should end it  
16 with a question somewhere: How do we get to that kind of  
17 recommendation in front of everything else we know? And I'm not  
18 talking about anything but from north of Marana, maybe Casa  
19 Grande 8 down -- why -- why we wouldn't use the existing route?

20 MR. BYERS: So there's -- I'm -- I'm real  
21 reluctant to answer a lot of questions here because there's --  
22 there's one thing that we have going -- because of the -- the  
23 current comment time period that we have, we have public comments  
24 and we have a public hearing.

25 MAYOR ROTHSCHILD: Even better. We -- why would

1 we want to hear answers from you when we could just make our  
2 comments?

3 MR. BYERS: There you go.

4 MAYOR ROTHSCHILD: But, anyway, so I'm going to  
5 start with Council Member Kozachik.

6 COUNCIL MEMBER KOZACHIK: And so I won't ask  
7 questions. I'll just make a couple of comments. I'm equally  
8 perplexed as Jonathan is and the City Manager as to why when we  
9 sent in specific -- identifying specific pieces of major capital  
10 infrastructure that affected the -- the water supply for this  
11 entire region, that they're just omitted from the report. So  
12 that's -- that's one comment.

13 The second comment is with respect to Frame 7 -- and  
14 Jonathan was reading it. Interstate Design Standards shall avoid  
15 or minimize impacts to all of these -- all of these items that he  
16 read off. And the recommended alternative impacts every single  
17 one of them.

18 UNIDENTIFIED FEMALE: Very negatively.

19 COUNCIL MEMBER KOZACHIK: So that would be another  
20 comment.

21 Another comment is that I -- I get the sense that,  
22 because of the -- because of those two first -- first two points,  
23 there's a sense in this region anyway, among many people, that  
24 this is a done deal and -- and, you know, what the hell? Why are  
25 we even bothering? Because with the egregious impacts that I

1 just mentioned and that are -- exist on Frame 7, that that  
2 alternative shouldn't even be under consideration if it weren't  
3 already a done deal, and so that's a frustration that I hear a  
4 lot.

5 And I guess I can't avoid one -- one question and that  
6 is: Who -- who has ADOT spoken to that really supports this  
7 alternative that's west of the Tucson Mountains and through Avra  
8 Valley; is that -- can you answer that? 'Cause somebody must  
9 support it or it wouldn't be on the -- it wouldn't be an  
10 alternative.

11 MR. BYERS: ADOT is not the only agency that is  
12 working on this. We have multiple agencies, including all of our  
13 federal parks that are working on this. It is -- it is working  
14 through all the science and all of the information that has been  
15 put together and gathered that these recommendations are coming  
16 forth.

17 COUNCIL MEMBER KOZACHIK: Okay. Fine. It would  
18 be fair -- it would be -- it would be helpful for me anyway to  
19 know who supports that so that we could go and affirmatively  
20 education them.

21 MAYOR ROTHSCHILD: Yeah, I know. That's right.  
22 (Applause.)

23 MAYOR ROTHSCHILD: Council Member Romero. We'll  
24 just go down the line. Council Member Romero.

25 COUNCIL MEMBER ROMERO: Thank you, Mr. Mayor.

1 I just want to make sure that we also add into the  
2 record later tonight we have a resolution against the proposed I-  
3 11 recommended option; so I'd like to make sure that this  
4 particular recommendation or resolution that we have later  
5 tonight makes it also into the record for the comment period.

6 But, I mean, what are the agencies, federal agencies,  
7 that ADOT is working with that came to the conclusion that this  
8 particular route would be the recommended route?

9 MR. BYERS: So there's -- there's nine agencies  
10 that are working with us in putting -- putting this together,  
11 meet on a monthly basis, and have for the last two and half  
12 years, putting this together. This is a consensus, and it has to  
13 be a consensus through that group, to put this forward.

14 So it's -- like I said, it's working through all the  
15 science, it's working through all the information, it's using the  
16 data that we have gathered to bring forth the recommendation that  
17 is in the report.

18 MAYOR ROTHSCHILD: It -- it --

19 COUNCIL MEMBER ROMERO: Okay. But what are the  
20 agencies?

21 MAYOR ROTHSCHILD: Yeah.

22 MR. BYERS: So we -- we have -- we have the Bureau  
23 of Rec. We have the Forest Service. We have -- let's see here.  
24 I'm trying to think of who all we have. The Game and -- or the  
25 U.S. Fish and Wildlife. We have the Forest Service. We have --

1 I can't remember them all off the top of my head, but, basically,  
2 every agency within the Department of Interior.

3 MAYOR ROTHSCHILD: Could -- could you -- could you  
4 get -- could you get us a list of those agencies?

5 MR. BYERS: In fact, they're all listed in the  
6 report, but I can certainly get that information.

7 MAYOR ROTHSCHILD: Okay. Fine.

8 COUNCIL MEMBER ROMERO: And the input from the  
9 community will mean -- be made clear, both from jurisdictions  
10 like ours and community representatives -- will be shared with  
11 the entire federal agencies and ADOT that is working on this --  
12 on this project?

13 MR. BYERS: Yes, and, in fact, it's up to all of  
14 those agencies, as well as ADOT and Federal Highway, to not only  
15 look at all of those but to answer every comment.

16 COUNCIL MEMBER ROMERO: Okay. So some of us on  
17 this Council -- I don't know -- I don't know exactly who lands  
18 where -- but I could speak for myself that I am not going to  
19 support this option; that actually me and a couple of others of  
20 my colleagues on the Council brought a resolution against this --  
21 this option; and that this could be a devastating economic and  
22 environmental blow to not just the City of Tucson but for the  
23 region.

24 It -- as the Mayor was saying, what you say on your  
25 paper in terms of Interstate Design Standards, avoiding or

1 minimizing impacts, all of -- each and every one of these impacts  
2 national parks and monument wildness areas, roadless areas,  
3 critical habitats, tribal lands, floodplains and -- and existing  
4 development; all of it is negatively impacted by this route. And  
5 so Avra Valley is an asset, a water asset, that serves our  
6 community and could -- could also be negatively impacted,

7 So I want to make it clear as day that we do have a  
8 resolution in front of us against this route and that we -- I  
9 will do everything in my power to work with your agencies and  
10 ADOT as much as we possibly can as a community to not approve  
11 this route because it affects our environment so much, it affects  
12 our economy so much by bypassing the City of Tucson.

13 And, to be honest with you, I think ADOT and these nine  
14 federal agencies should be looking at -- at not just investing in  
15 I-10 and I-19, but also investing in rail, because this  
16 particular route will cost billions of dollars more in terms of  
17 the alternative of investing on I-10 and I-19, what we already  
18 have, and on rail.

19 So I just -- I just want to add for the record that I  
20 don't support this. I will do everything I possibly can, along  
21 with my colleagues, to make sure that we find an alternative  
22 route. And that alternative route should be -- should be rail,  
23 and investing on I-19 and I10.

24 MAYOR ROTHSCHILD: Council Member Cunningham?

25 COUNCIL MEMBER CUNNINGHAM: You know what, I'm

1 looking at all this stuff. Let's -- let's begin with, you know,  
2 we've got the Department of Bureau of Land Commission, Bureau of  
3 Land Management, Bureau of Federal Highways. I've got Fish &  
4 Game, Wildlife. We've got all these things.

5 Does each agency send a designated representative to  
6 the committee?

7 MR. BYERS: Yes, sir.

8 COUNCIL MEMBER CUNNINGHAM: Do any of those  
9 committee members live in Tucson?

10 MR. BYERS: One -- or two -- two do.

11 COUNCIL MEMBER CUNNINGHAM: Two -- two --

12 MR. BYERS: Those being the two represented by  
13 ADOT.

14 COUNCIL MEMBER CUNNINGHAM: So no one from the  
15 federal agencies live in Tucson?

16 MR. BYERS: Not that I'm aware of, no.

17 COUNCIL MEMBER CUNNINGHAM: Just two people from  
18 ADOT who live in -- who live in Tucson -- because it doesn't  
19 sound like anybody from Tucson was in the room -- you talked  
20 about we avoid national monuments, national parks, the green --  
21 according to the website, the green, orange, purple and blue all  
22 go into Tucson Mountain Park, they all enter into the Saguaro  
23 wilderness of Saguaro East, one of them aligns right off of T-0  
24 land. So how is that -- that isn't even on your own -- that  
25 isn't even on their own criteria.

1           Not only that, we shouldn't even call this I-11, we  
2 should call this the "Ignore Tucson Corridor." I want to bring  
3 to people the words, "Two Guns, Canyon Diablo, Truxton,  
4 Valentine, Oatman, Goldroad;" those are all ghost towns in  
5 Arizona that used to be on Route 66 until they built a freeway  
6 bypassing them.

7           If this is the route selected, I will organize an  
8 initiative that will require us to take this to the Supreme Court  
9 to stop it. There is no way that anybody in their right mind  
10 from Tucson would think this alignment is -- does any good for  
11 anyone; from the ecological standpoints, to the cost to the  
12 government, to what it does to us economically, which potentially  
13 devastates us.

14           I can't even believe that not even the Mayor or the  
15 Manager could make any recommendations about this. This is one  
16 of these things where this goes back to, you know, I-8 and the  
17 San Diego freeway going to Toltec and not coming from Tucson; I  
18 mean, this is the same type of stuff. This has been going on for  
19 50 years where Phoenix decides what's best for Tucson.

20           Well, Phoenix doesn't -- they don't live here. This is  
21 not a way to treat a million people. There are a million people  
22 in the Tucson community and you basically -- the federal  
23 government basically just said, "You know what? We don't care  
24 about you guys."

25           MAYOR ROTHSCHILD: Okay. Council Member Durham?

1                   COUNCIL MEMBER DURHAM: I want to go on the  
2 record: Over my dead body will ADOT build a freeway in Avra  
3 Valley. (Applause.)

4                   You say -- I did a little research and the investment  
5 of Tucson Water in the recharge basins, wells, transmission  
6 lines, and more have cost Tucson Water's ratepayers over \$250  
7 million, but that -- the majority of that money was spent between  
8 2000 -- 2000 and 2004; that would be much greater now.

9                   There is the risk that the -- I -- I recognize that one  
10 possible route believes they can thread the needle between the  
11 existing recharge basins and the planned expansion area; and two  
12 require the recharge basins to be moved.

13                   First of all, there's the risk that they can't be moved  
14 at any cost because the -- the soil conditions, the -- the  
15 subsurface soil conditions, are the best and they're working for  
16 the existing locations of the recharge basins. We don't know,  
17 and you don't know, if they can even be moved. Tucson Water  
18 believes that the risk is -- that the risk that they can't be  
19 moved is high. We're pretty sure that ADOT has not done -- has  
20 not fully investigated this risk.

21                   Then there is the possibility of a hazardous waste  
22 spill; a truck carrying hazardous waste turns over and it  
23 contaminates the Tucson water supply. I recommend to ADOT that  
24 you take seriously that risk. That's all.

25                   MAYOR ROTHSCHILD: And thank you Council Member

1 Durham.

2 Council Member Scott?

3 COUNCIL MEMBER SCOTT: Thank you. I would echo my  
4 colleagues' statements. I think you'd find all of us probably  
5 unanimously agreeing that this particular selection of this road  
6 for the City of Tucson does not meet all of the standards that  
7 you -- that your group has put together.

8 I think it's -- should be of serious note that Tucson  
9 is the second largest city in the whole state. I think we need  
10 to have you recognize that there are -- that's a very significant  
11 population here. We are not a small ville. We are a large city  
12 compared to many. Sure, Phoenix is bigger. But we are the  
13 second largest city in the entire state. So I think our voice  
14 should be heard loud and clear as to our thoughts.

15 The population numbers that were used to start this  
16 process, apparently, should be challenged seriously because if  
17 you base your -- if you base your process on data that isn't  
18 current, or reflection of the future, then you're missing the  
19 very thing you're trying to address which is: We want to go and  
20 address the issues of population growth. Well, I think there's a  
21 question about that database. So that argument falls short of  
22 succeeding.

23 So, then, I-10 itself, just right now: If you have an  
24 asset, you should take care of it. And for those of us who go  
25 back and forth on I-10 -- which I'm sure you enjoy doing --

1 you'll find that there is quite a bit of money that still needs  
2 to be invested in the current asset you have. So where's the  
3 money going to go if you start a brand new project where you're  
4 not even taking care of the one you have to the fullest extent  
5 possible? So it's just also a question of money.

6 And on a water note: The recharge basins were  
7 originally set up by the City of Tucson in order to address  
8 federal issues about recharging water. Great! Phoenix did not  
9 think that was a good idea at first, but now they're paying City  
10 of Tucson to recharge their water. So it doesn't just affect  
11 CAVSARP and SAVSARP for the City of Tucson; it affects the water  
12 supply --

13 MAYOR ROTHSCHILD: Yeah.

14 COUNCIL MEMBER SCOTT: -- for the City of Phoenix,  
15 amongst others.

16 So those are some questions and statements that I -- I  
17 would like to address. And I wish that we could see some  
18 reflection of those kinds of thoughts when you're presenting to  
19 us something that, as one of my colleagues said, might look like  
20 a done deal.

21 And we don't want to see this go through. And I'll  
22 think you'll see a large lion roar come out of this area with  
23 regard to whether this should move forward as-is.

24 MAYOR ROTHSCHILD: Mr. Clerk, are you capable of  
25 making a transcript, a written transcript of this, and submitting

1 it along with whatever we may do?

2 MR. RANDOLPH: Yes, Your Honor.

3 MAYOR ROTHSCHILD: Okay. I think that we should  
4 do that. There's been some really good comments here.

5 Council Member Fimbres, you want to say anything?

6 COUNCIL MEMBER FIMBRES: Yes. Thank you, Mr.  
7 Mayor.

8 Does the state have funding to start this project? I  
9 know this project's been around for, what, four or -- you just  
10 had two years to do a report and now this -- the report's come  
11 back and this group has voted on moving this -- this one plan  
12 phase now. But is there funding to move and where is the funding  
13 coming from if we --

14 MR. BYERS: There is --

15 COUNCIL MEMBER FIMBRES: --- there is no funding  
16 currently, right?

17 MR. BYERS: There is no funding that -- in the  
18 current program. There is no funding in a future program,  
19 whether it be state, federal or anything else. At this point in  
20 time, there's absolutely no funding --

21 COUNCIL MEMBER FIMBRES: So what type of --

22 MR. BYERS: -- at all.

23 COUNCIL MEMBER FIMBRES: -- time frame are we  
24 looking at with the --

25 MR. BYERS: It's -- it's way, way out, yeah.

1           COUNCIL MEMBER FIMBRES: So what we need to do is  
2 plan it right, do it right, and relook at the route, 'cause you  
3 need operations and maintenance costs to maintain the highway;  
4 and you're not going to get it if you're bypassing the City of  
5 Tucson.

6           And -- and this was created like the CANAMEX Corridor  
7 was talked about, about enriching and creating more development  
8 in these cities for long-term sustainability, and I don't see  
9 this. Plus, then where you're going through is going to  
10 jeopardize our water sources, our key precious resource is our  
11 water and that's going to be jeopardized. So I think we need to  
12 look at this and revisit it.

13           And I know we have a resolution tonight? Was --

14           MAYOR ROTHSCHILD: Yes.

15           COUNCIL MEMBER FIMBRES: Okay. And we also have  
16 other thoughts and we -- we want to work with you to improve the  
17 route. Obviously, there were no Tucsonans or folks in Nogales or  
18 Sahuarita on this to plan this thing correctly. Thank you.

19           MAYOR ROTHSCHILD: Council Member Kozachik, do you  
20 have any more --

21           COUNCIL MEMBER KOZACHIK: I would just say the  
22 point of the funding, that's really not an issue for me because  
23 we need to nip this one in the bud before the funding becomes  
24 available as you -- we can't back out of this. (Applause.)

25           MAYOR ROTHSCHILD: Okay. I'm going to go back to

1 Council Member Durham. And we'll come back down and we'll finish  
2 up.

3 COUNCIL MEMBER DURHAM: You know, I -- I think  
4 that mostly Phoenix-based ADOT would like to make Tucson look  
5 more like Phoenix: freeways everywhere, lots of sprawl. The  
6 Avra Valley route for I-11 will cause tremendous sprawl,  
7 development. And it's just -- it's just not a good idea. Like I  
8 say, I think maybe Phoenix-based ADOT would like to make Tucson  
9 look more like Phoenix: lots of sprawl and freeways everywhere.

10 MAYOR ROTHSCHILD: Council Member Cunningham?

11 COUNCIL MEMBER CUNNINGHAM: I want to be  
12 constructive, too. I mean, I'm a little -- everybody's very  
13 frustrated about the -- the lot -- the -- the route that gets  
14 changed. I really ask the group to reconsider the orange  
15 aligning from Harden Way to the Air Max Park. That's really the  
16 -- when you guys -- it's a 280-mile route. Our concern is this  
17 28-mile thing that's on our -- that's in our city. And there is  
18 an orange route, I don't know how that discussion got -- I really  
19 don't know how that discussion got changed or why it ended up  
20 going the way it went and how they ended up deciding that. But I  
21 really think they ought to look at that orange route, revisit the  
22 orange route specifically from -- when you really consider it  
23 specifically from Harden Road -- about Cortaro Farms Road to --  
24 to the Air Max Park, which is -- I want to say it's right after  
25 Mineral Hill Road -- Helmet Peak Road about -- I think those --

1 that's the area that Tucson -- that is really part of Tucson.

2 So we should have some say about that one part of it.  
3 It's -- it's less than 30 miles in the entire project. Look, no  
4 one wants to kill a federal project in the -- the big picture,  
5 but everybody wants to understand that -- we know best for our  
6 community, or we're supposed to, we -- or otherwise what -- what  
7 good are we? And I think that this orange route, that right-of-  
8 way is there, I think in the -- in the costs that you guys are  
9 looking at, you'll probably save a little money and you'll also  
10 build something that will be functional for -- for Tucson.

11 So that would be what I'd say: Kind of all or nothing  
12 is that orange route.

13 MAYOR ROTHSCHILD: Mr. Mayor?

14 MAYOR ROTHSCHILD: Yes, Council Member Romero.

15 COUNCIL MEMBER ROMERO: Mr. City Manager, we need  
16 to make sure that -- that our statements tonight are a resolution  
17 against this -- this route is also shared with our congressional  
18 delegation to make sure that they understand how the City of  
19 Tucson feels about this -- about this route. And so we need to  
20 get our resolution and our commentary in the hands of each and  
21 every one of the delegates, congressional delegates, in the State  
22 of Arizona.

23 We also have -- we also pay D.C. lobbyists to do work  
24 for us in D.C., make sure that they are well aware of our  
25 position on this and that they let the agencies -- the federal

1 agencies that are involved in this process know -- each and every  
2 one of them know how the City of Tucson stands on this case;  
3 because it's nice for ADOT to be here, but I would much rather  
4 we, the City of Tucson, communicate with these federal agencies  
5 and our congressional delegation so we make it very clear that  
6 the City of Tucson does not support this iteration of I-11.

7           MAYOR ROTHSCHILD: Okay. All right. Thank you,  
8 sir, for coming in and -- and hearing us. I'm sure you're  
9 hearing things all over the state, but we do appreciate being  
10 able to get on the record before the public comment period has  
11 ended. So thank you very much.

12           MR. BYERS: Thank you for having me.

13           MAYOR ROTHSCHILD: Appreciate it. Okay.

14           \* \* \* \* \*

15 (Transcriptionist's Note: A brief discussion regarding Item 8 is  
16 resumed at a later time during the meeting.)

17           \* \* \* \* \*

18           MAYOR ROTHSCHILD: Let's move on to Item 14, which  
19 which before we go to that, our City Attorney has advised me that  
20 if we want to send the transcript from our discussion today with  
21 the ADOT to ADOT, we need a motion and second --

22           COUNCIL MEMBER FIMBRES: So moved.

23           MAYOR ROTHSCHILD: -- to do that.

24           UNIDENTIFIED COUNCIL MEMBER: Second.

25           MAYOR ROTHSCHILD: That motion and second to

1 authorize the Clerk to transcribe and send to ADOT our discussion  
2 today on Item 10 (sic) I think, whatever item --

3 MR. RANDOLPH: Included in that would also be the  
4 direction to the Manager to send the letter that was included in  
5 the materials.

6 MAYOR ROTHSCHILD: Okay. All right.

7 MR. ORTEGA: Mr. Mayor, I'm going to make a few  
8 changes, obviously, based on the conversation here, but it is my  
9 intent to incorporate and then we'll actually attach it all in  
10 the packet just to --

11 MAYOR ROTHSCHILD: Okay.

12 MR. ORTEGA: -- update it.

13 MAYOR ROTHSCHILD: And a motion --

14 COUNCIL MEMBER FIMBRES: And on my motion, Mr.  
15 Mayor.

16 MAYOR ROTHSCHILD: Okay. Motion and second.

17 COUNCIL MEMBER FIMBRES: Yeah.

18 MAYOR ROTHSCHILD: All in favor say, "Aye." Aye.  
19 Anyone opposed?

20 (Motion is carried by Council Members' voice vote of 7  
21 to 0.)

22 MAYOR ROTHSCHILD: All right. That passes.

23 (Conclusion of Study Session discussion of Item 8.)

24 \* \* \* \* \*

**CERTIFICATE**

I hereby certify that, to the best of my ability, the foregoing is a true and accurate transcription of the digitally-recorded Mayor and Council Study Session, held on June 18th, 2019, regarding the Arizona Department of Transportation (ADOT) I-11 Draft Tier 1 Environmental Impact Statement (EIS) (City Wide) SS/JUN18-19-134.

Transcription completed: June 22nd, 2019.

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DANIELLE L. KRASSOW  
Legal Transcriptionist  
M&M Typing Service

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.

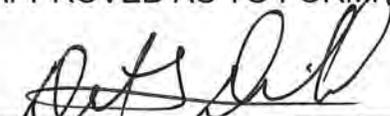
PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Tucson, Arizona, June 18, 2019.

  
\_\_\_\_\_  
MAYOR

ATTEST:

  
\_\_\_\_\_  
CITY CLERK

APPROVED AS TO FORM:

  
\_\_\_\_\_  
CITY ATTORNEY

del

MR/dg  
6/13/19

REVIEWED BY:

  
\_\_\_\_\_  
CITY MANAGER