



## Talking Points for Written Comments on the Tier 1 Interstate 11 FEIS

### Opposition to the West Preferred Alternative Option

#### **BACKGROUND**

We oppose the West Preferred Alternative Option (West Option) described in the Tier 1 Final Environmental Impact Statement (FEIS) for Interstate 11 (I-11). This route is located west of Tucson and bypasses Tucson through rural Altar and Avra Valleys, a landscape bordered by treasured and protected public lands and iconic tourist attractions that will be irreparably harmed by a nearby freeway. We also request an extension of the comment period from 30 days to 120 days.

#### **KEY TALKING POINTS**

- The 30-day comment period is insufficient for review of the 5,800 pages of documents and ensuring the public is aware of the opportunity to review and comment on the project.
- Many of the communities impacted by the Preferred Alternative Options within the Corridor Study area are minority and low-income populations who in many cases do not have access to the traditional means by which federal EIS processes are advertised and published. Both proposed alternatives will have disproportionately adverse effects on these populations and they will need adequate time to be notified via ground mail or other means.
- The West Option would damage both natural resources and degrade the visitor experience at a wide array of public lands, especially those located in the Tucson Mountains. No mitigation could offset these negative impacts.
- Building a freeway through Bureau of Reclamation mitigation lands would violate the purpose for which these lands were set aside. It is impossible to adequately mitigate for the impacts from a federal freeway to lands that already mitigate for another federal project, the Central Arizona Project canal.
- The West Option would sever critical wildlife corridors. This fragmentation would destroy the ability of wildlife species such as desert bighorn sheep to disperse, roam, find new mates, and expand their home ranges.
- The West Option would cost more to build than the East Option, which would co-locate I-11 with I-19 and I-10 through Tucson.
- Downtown Tucson and economic powerhouses such as the Arizona-Sonora Desert Museum and Saguaro National Park would see reduced revenue and negative economic impacts.
- The West Option would cause significant noise, air, and light pollution, encourage urban sprawl, and destroy the rural character of the Altar and Avra Valleys.
- Lands and wildlife habitat that would be severely impacted by the West Option include mitigation lands for Pima County's Section 10 Habitat Conservation Plan, a part of the nationally-recognized Sonoran Desert Conservation Plan.
- In 2019, the City of Tucson voiced opposition to the West Option (then called the Preferred Alternative in the DEIS) as it places a freeway adjacent to the City's major water supply. We cannot guard against a toxic spill that would threaten Tucson's most vital resource.

## **EXPANDED TALKING POINTS**

### **EXTENSION OF PUBLIC COMMENT DEADLINE**

The deadline for public comments should be extended from 30 days to 120 days to allow a fair and thorough review by the public.

- The 30-day comment period is insufficient for review of the 5,800 pages of documents and ensuring the public is aware of the opportunity to review and comment on the project.
- Because the impacts of this project are intergenerational, we urge you to consider an extension to provide the public with a full and fair opportunity to participate in this process.
- Many of the communities impacted by the Preferred Alternative Options within the Corridor Study area are minority and low-income populations who in many cases do not have access to the traditional means by which federal EIS processes are advertised and published. Both proposed alternatives will have disproportionately adverse effects on these populations and they will need adequate time to be notified via ground mail or other means.
- The West Option through Pima County is proposed through traditional Tohono O'odham lands where tribal members may have limited internet access.
- The FEIS is 5,800 pages of text, maps, and other figures – the length and breadth of this document warrants a longer public comment period to allow adequate review by the public.
- A new Interstate freeway has not been built in this metropolitan area since 1961 – over two generations ago. Many of the issues will have long-lasting, significant impacts on our community and we need sufficient time to review the record, research issues and concerns, and provide a substantive response.

### **IMPACTS TO PUBLIC LANDS**

The West Option is located perilously close to a wide array of public lands, including:

- Federal lands: Saguaro National Park West, Ironwood Forest National Monument, and the Tucson Mitigation Corridor (owned by the Bureau of Reclamation and managed by Pima County).
- County lands: Tucson Mountain Park and open space properties purchased and protected under Pima County's Sonoran Desert Conservation Plan and Section 10 Habitat Conservation Plan.
- Tribal lands owned by the Pascua Yaqui Tribe and the Tohono O'odham Nation.

### **IMPACTS TO WILDLIFE CORRIDORS**

The West Option:

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

## **IMPACTS TO NOISE, AIR, AND LIGHT POLLUTION**

The West Option would:

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

## **IMPACTS TO THE ECONOMY**

The West Option, along with the entire proposed route *from the border to Casa Grande* would:

- Cause economic loss to Tucson by diverting traffic away from Tucson's downtown and growing business districts.
- Lead to negative economic impacts to tourism powerhouses such as the Arizona-Sonora Desert Museum and Saguaro National Park West, among many others.
- Lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other services.

## **IMPACTS TO PRIVATE PROPERTY**

The West Option would:

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

**FOR MORE INFORMATION, visit our action webpage at:**

<https://www.sonorandesert.org/learning-more/interstate-11/>

**\*\*We are actively working on our full set of comments and will make an announcement on our social media channels and our website when they are available.\*\***

[Facebook](#) \* [Instagram](#) \* [Twitter](#) \* [CSDP website](#)

**You can submit public comments in multiple ways, including:**

**Online** [Provide Your Comments](#) | [Proporcionar sus comentarios](#)

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The main I-11 FEIS website is at: <http://origin.i11study.com/Arizona/>

A traditional PDF version of the FEIS (split into multiple documents) can be found  
at: <http://origin.i11study.com/Arizona/Documents.asp>

An interactive version of the FEIS can be accessed at: <https://i11.ee.alytics.com/I11Arizona-Tier1EIS/>



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