



## Coalition for Sonoran Desert Protection

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Arizona Center for Law  
in the Public Interest

Arizona League of Conservation  
Voters Education Fund

Arizona Native Plant Society

Bat Conservation International

Cascabel Conservation  
Association

Center for Biological Diversity

Center for Environmental  
Connections

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Drylands Institute

Empire Fagan Coalition

Environmental and Cultural  
Conservation Organization

Environmental Law Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro National  
Park

Friends of Tortolita

Gates Pass Area Neighborhood  
Association

Native Seeds/SEARCH

Neighborhood Coalition of  
Greater Tucson

Northwest Neighborhoods  
Alliance

Protect Land and  
Neighborhoods

Safford Peak Watershed  
Education Team

Save the Scenic Santa Ritas

Sierra Club—Grand Canyon  
Chapter

Sierra Club—Rincon Group

Silverbell Mountain Alliance

Sky Island Alliance

Sky Island Watch

Society for Ecological  
Restoration

Sonoran Arthropod  
Studies Institute

Sonoran Permaculture Guild

Southwestern Biological  
Institute

Tortolita Homeowners  
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

Women for Sustainable  
Technologies

Ms. Sondra Rosenberg, PTP  
Nevada Department of Transportation  
1263 S. Stewart St., Carson City, NV 89712  
(775) 888-7241

Mr. Michael Kies, PE  
Arizona Department of Transportation  
206 S. 17th Ave., Phoenix, AZ 85007  
(602) 712-8140

### **RE: I-11 and Intermountain West Corridor Study - Corridor Justification Report**

Dear Ms. Rosenberg and Mr. Kies,

The Coalition for Sonoran Desert Protection appreciates the opportunity to provide comments on the *I-11 and Intermountain West Corridor Study: Corridor Justification Report*.

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

While we understand that detailed environmental analyses will be a part of subsequent studies for this corridor, we strongly believe that environmental considerations must be integrated into transportation corridor planning from the very beginning of the planning process. Additionally, our comments address the Draft Pima County Interstate 11 Alignment identified in the Pima County Administrator's July 2, 2013 report entitled *Transportation Planning Activities in the Area West of the Tucson Mountains Linkage with Interstates 19 and 10 through the Aerospace and Defense Corridor* and largely focus on a potential alignment in the Avra Valley area. We recognize, however, that other alignments in southern Arizona will be considered; the major environmental impact categories outlined below should also be applied to these other alignments.

In summary, our comments highlight the major environmental impacts that should be considered as this corridor is evaluated, including impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation's Central Arizona Project mitigation corridor; local conservation lands such as Tucson Mountain Park, planned mitigation lands for Habitat Conservation Plans under development by the City of Tucson, Pima County, and Town of Marana, and Pima County's Conservation Lands System; critical wildlife linkages such as the Coyote-Ironwood-Tucson Wildlife Linkage and Ironwood-Picacho Wildlife Linkage; and increasingly rare riparian habitat. We also include a brief discussion regarding how the Southern Arizona Future Connectivity Corridor is being evaluated and some general comments about larger impacts this corridor could have on our region.

## **Major Environmental Impacts for Evaluation**

### *Federal and Local Protected Areas*

The Draft Pima County Interstate 11 Alignment runs through Avra Valley. This alignment would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project mitigation corridor, and planned mitigation lands for Habitat Conservation Plans (HCPs) under development by the City of Tucson, Pima County, and the Town of Marana (the Tucson and Pima County HCPs are in their final stages of approval by the U.S. Fish and Wildlife Service). A comprehensive analysis of the impacts to protected areas and the biological resources they contain should be performed for all proposed Southern Arizona Future Connectivity Corridor alignments. These protected lands are public investments in conservation, and reduced ecological values due to any proposed infrastructure developments, including highways, should be avoided to the greatest extent practicable and mitigated in full where avoidance is deemed impossible.

### *Wildlife Linkages*

An Interstate 11 alignment through Avra Valley would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally-recognized regional conservation plan with over 15 years of implementation, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by the Arizona Department of Transportation and Arizona Game and Fish Department, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona Wildlife Linkages Assessment. And most recently, Arizona Game and Fish Department's Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Draft Pima County Interstate 11 Alignment would also sever the Ironwood-Picacho wildlife linkage. Severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature such as a new highway, severing an important movement area for wildlife, cannot be adequately mitigated off-site.

### *Pima County's Conservation Lands System*

The Draft Pima County Interstate 11 Alignment would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the US Fish & Wildlife Service, Arizona Game & Fish Department, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically-based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas, Biological Core Areas, Multiple Use Management Areas, and Special Species Management Areas. Each land category has recommended open space guidelines that are applied when landowners request rezoning or other discretionary actions from the County.

The CLS is a cornerstone of the Sonoran Desert Conservation Plan and has guided many conservation decisions in Pima County since its adoption. Ninety-four percent (94%) of the Draft Pima County Interstate 11 Alignment impacts land in one or more categories of the CLS. According to the County's own calculation, these impacts would require nearly 5,000 acres of mitigation. Impacts to Pima County's Sonoran Desert Conservation Plan and the CLS should be considered for all potential corridor alignments. All impacts to CLS acreage needs to be fully mitigated close to the area of impact.

### *Riparian Habitat*

An Avra Valley Interstate 11 corridor would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

"Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state."<sup>1</sup>

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<sup>1</sup> [http://www.azgfd.gov/pdfs/w\\_c/partners\\_flight/APIF%20Conservation%20Plan.1999.Final.pdf](http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf)

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of the floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has set conservation guidelines to make every effort to protect, restore, and enhance on-site the structure and functions of the CLS's Important Riparian Areas and other riparian systems. Off-site mitigation of riparian resources is a less favorable option. Forty-seven acres of the CLS's Important Riparian Areas would be impacted by this Draft Alignment. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

### **Evaluation of Southern Arizona Future Connectivity Corridor**

At the July 16<sup>th</sup>, 2013 Stakeholders Partners meeting, a Draft Level 1 Evaluation Criteria matrix for the evaluation of all corridor segments was given to attendees. The 11<sup>th</sup> proposed criterion asks, under the "Environmental Sustainability" evaluation category, "How well does this alternative minimize environmental impacts (such as waterways, floodplains, aquifers, and biological connectivity)?" Unfortunately, in the presentation at the meeting, the Environmental Sustainability criterion was omitted from the "Goals and Objectives" that were presented. We encourage you to include Environmental Sustainability as an explicit goal and objective with the other ten that were presented (such as Economics, Capacity/Congestion, and System Linkage). Environmental Sustainability needs to be considered in tandem with the other listed criteria, especially given the significant local and state resources that have been invested in protecting this area of southern Arizona.

### **2007 Pima County Resolution**

In 2007, the Pima County Board of Supervisors passed Resolution No. 2007-343 opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Additionally, the Board called for the expansion of "capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor." We strongly concur with Pima County's 2007 resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors. **In consideration of the Southern Arizona Future Connectivity Corridor, we argue that expanding existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best minimize environmental impacts. The Coalition questions the need for any new southern Arizona corridor between the Mexican border and Phoenix.**

### **Broader Impacts**

Finally, an Interstate 11 alignment through Avra Valley would dramatically increase accessibility and thus encourage commercial and residential development. Such exurban development

would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs, and force major changes to existing land-use and zoning designations. Existing land use plans have identified the areas most appropriate for growth and any new transportation corridors should be appropriately sited within those existing growth areas.

Thank you for the opportunity to provide initial comments on the *I-11 and Intermountain West Corridor Study*. **We strongly encourage you to include all environmental considerations, including those outlined above, from this point forward in the planning process.** The Coalition would like to continue to be engaged as a Stakeholder Partner in this process and would welcome the opportunity to provide additional comments in the future.

Sincerely,

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive, flowing style.

Carolyn Campbell  
Executive Director