

I-11 Joint Stakeholder Community Planning Group

I-11 Position Statement

At the invitation of the Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA), representatives of several stakeholder organizations recently participated in a process to explore two alternative routes for the proposed Interstate 11 through Pima County. The stakeholders were convened in two separate groups, corresponding to the two alternatives being considered: (1) a new bypass freeway through Avra Valley and (2) expanding I-19 / I-10 through the city center. We appreciated being offered the opportunity to explore these routes and discuss the impacts and opportunities associated with each. As part of the federal NEPA Scoping Process, the two groups met separately in March and April, for a total of 9 hours for each group. However, after the scoping meetings ended, members of both groups concluded that more meaningful input could be provided to the federal and state agencies if they continued to meet as a joint group to evaluate impacts and opportunities of both corridor alternatives. As such, members of these two stakeholder groups are now working together, and we have arrived at several important conclusions, which we highlight here.

The undersigned representatives of both groups of stakeholders agreed that of the two routes proposed for a future I-11 highway, the expansion and reconfiguration of the existing I-10 and I-19 corridor is the only acceptable route. A bypass through Avra Valley is not acceptable.

Any further consideration of the Avra Valley option must take into account not only the input from both stakeholder groups but also the concerns of the Tohono O'odham Nation, whose land it impacts.

There appear to be significant shortcomings associated with the federal review process that focuses on new highway construction. Nevertheless, we believe that there could be a significant opportunity to address some of the historic negative consequences that resulted from the construction of I-10, which physically divided our community and diminished the quality of life of our downtown and other neighborhoods along the highway.

Instead of simply adding new lanes to our existing highway, we should consider redesigning portions of it—either going underground or suspended—so that we can reconnect our city. Moreover, focusing on new highway construction overlooks other less costly options that would encourage the free flow of goods. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;
- Technologies that improve traffic flows;

- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

Assessing the cumulative impacts of these options on congestion should be considered before contemplating either a bypass or an expanded I-10. In addition, the following studies must be completed, with the results communicated to community stakeholders and incorporated into the decision process early on.

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the project. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Santa Cruz River.
- Social and economic equity impacts.

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any build alternative.

Furthermore, we strongly encourage ADOT and FHWA to refer to the I-11 Super Corridor study final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Utilizing such studies and designs would help us reduce impacts in our downtown and surrounding areas.

We believe that our community stands to benefit economically from increased trade between the United States and Mexico, and our location means we have much to contribute to and benefit from a vibrant trade corridor. However, we must not let a failure of vision and a lack of attention to practical options limit how we respond to the potential economic opportunities associated with the Interstate 11 proposal(s).

We also believe that civic and business organizations, including the groups we represent, should take the initiative to further explore these and other options available

to us, including a congestion-relief study that would model realistic and less costly options to improve the flow of goods through town, a community design charette that illustrates how we might redesign I-10, and an economic benefits study focused on the facilitation of moving goods through the center of the city and the reconnection of downtown areas now divided by the existing freeway.

In the months to come, we will be reaching out to business and civic leaders to secure their involvement and support in these efforts. By working together, we can make our community a better place to live, work, and trade.

We appreciate the opportunity to have participated in the ADOT/FHwA stakeholder process in order to provide valued input into this transportation proposal.

Thank you.

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