



Coalition for Sonoran Desert Protection

738 N. 5th Ave., Suite 205
Tucson, Arizona 85705
520.388.9925 * sonorandesert.org

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Arizona Center for Law
in the Public Interest
Arizona Master Naturalist
Association
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

Governor Katie Hobbs
State of Arizona
1700 W. Washington St.
Phoenix, AZ 85007

Dear Governor Hobbs:

The Coalition for Sonoran Desert Protection is an alliance of 32 member groups representing over 30,000 local members whose mission is to protect the biodiversity of the Sonoran Desert in southern Arizona through science-based advocacy, education, and collaboration. We work on a grassroots level, leveraging the expertise, experience, and knowledgebase of our member groups and other community partners into long-lasting positive change for Sonoran Desert conservation.

The Coalition has been involved in commenting on, and educating the community about, the proposed Interstate 11 since the scoping process in 2013. While we have consistently questioned the Purpose and Need of a new freeway through Arizona from Mexico to Nevada, ADOT and FHWA have not directly responded to any of our comments questioning this need. What the Coalition finds particularly egregious is what is referred to in the Tier 1 Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) as the “West Option,” through Pima County.

It is worth noting that at the two public hearings held during the Draft EIS process, in Tucson and in Marana, with more than 200 in attendance, no one that spoke supported the West Option.

This new highway, if built, would undo over 100 years of conservation achievements by local and national, and tribal government officials, specifically in the Tucson Mountains – Avra Valley area. Below are examples of these actions:

- Establishment of Tucson Mountain Park (1924)
- Establishment of Saguaro National Monument/Park – Tucson Mountain Unit (1961)
- Establishment of the Central Arizona Project siphons and land bridges through Pima County (1992)
- Establishment of the Bureau of Reclamation Tucson Mitigation Corridor (1990)
- Establishment of the 450-acre Mitigation Corridor for the Tohono O’odham Schuk Toak Farm (1997)
- Establishment of Ironwood Forest National Monument (2000)

- Establishment of formally recorded Mitigation Parcels by the City of Tucson for the construction of the Central Avra Valley Storage and Recovery Project (2012)
- Pima County acquisition of considerable preserve lands to provide mitigation for the county's Multi-Species Habitat Conservation Plan (MSCP), or ESA Section 10 Incidental Take Permit (2004-2022)
- Pima County acquisition of 6 parcels totaling ~40 acres, in conjunction with U.S. Fish and Wildlife Service Section 6 grant, adjacent to CAP canal, 'ecoduct' corridor and BOR Mitigation Corridor. These land acquisitions provide for additional mitigation for Pima County's MSCP (2022/23)

These preserve lands and the wildlife connectivity they provide would be irreparably harmed by a new highway. If this proposed West Option is built, it would undo over 100 years of conservation. Further fragmenting habitat for species that already need help moving through the landscape would doom many species, such as the Pima pineapple cactus (which does not transplant well), the Sonoran desert tortoise, and the cactus ferruginous pygmy-owl. The federally threatened pygmy-owl has been documented to be unable to cross I-10; another freeway in the midst of their habitat would be disastrous.

I would like to provide a few quotes from federal, state and local agencies to FHWA and ADOT on the FEIS; agencies that have been involved as either a Cooperating Agency or a Participating Agency. Many of the agencies expressed considerable concerns. These agencies commonly expressed that their concerns were not addressed by FHWA. So much so, that after commenting on the FEIS Administrative Draft, they felt that they needed to comment again on the Public Draft and state to FHWA that these serious concerns were dismissed.

From the Department of Interior, Bureau of Reclamation (August 16, 2021):

Based on the FEIS and the Section 4(f) Evaluation, the Preferred Alternative - West Option (the former Recommended Alternative) through the Tucson Mitigation Corridor (TMC) would result in permanent adverse impacts to the primary function of the TMC. The FWCA of 1958 (PL 85-624, 16 U.S.C. 661 et seq.) requires that "lands described herein for fish and wildlife purposes shall not become subject to exchange or other transaction if those actions would defeat the initial purpose of their acquisition [16 U.S.C., section 663(d)]." As identified in past correspondence, the TMC was established under the authority of the FWCA "[t]o mitigate for the movement disruption impacts, not totally compensated for by the wildlife crossing structures over the aqueduct, by providing an undeveloped and long-term movement corridor for wildlife to maintain and promote normal gene flow while avoiding genetic isolation of the Tucson Mountains and wildlife habitat to the west."

and
The FEIS contains no information supporting the proposition that construction of a major highway through the TMC would not defeat this initial purpose of the property.

From the National Park Service (August 16, 2021):

As reflected in NPS' comments on the Administrative FEIS, the Preferred Alternative - West Option has the potential to significantly impact multiple resources under NPS management. The Preferred Alternative - West Option will occur 0.3 miles from Saguaro NP and 0.6 miles from the federally designated Saguaro Wilderness, and has the potential to threaten the natural, cultural, and recreational experiences these areas provide the public.

and

The NPS disagrees with FHWA's classification of Saguaro NP as a recreation area and to not apply the Ecological Intrusion criterion to Saguaro NP and Saguaro Wilderness.

From the City of Tucson (August 16, 2024):

The City continues its strong opposition to any I-11 alignment that travels through Avra Valley, such as the "West Option". On August 10, 2021, the Mayor and Council unanimously passed Resolution #23386 reaffirming its strong opposition to the currently proposed "West Option" alignment of I-11, that would have the effect of bypassing the existing Interstate 10.

and

As mentioned in previous comments, the economic impact to the City of Tucson of the "West Option" is extreme.

and

This alternative severely impacts the Central and Southern Avra Valley Storage and Recovery Projects (CAVSARP/SAVSARP) facilities, 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). Further, the aquifer supported by CAVSARP and SAVSARP has yet to experience water quality impacts from the commercial, industrial, and transportation uses that would inevitably be associated with a major interstate highway through Avra Valley. This is a critical concern for Tucson, as we have lost access to about 20% of our potable water production capacity over the past 10 years due to aquifer contamination from per- and polyfluoroalkyl substances (PFAS) and other chemicals of concern.

These are but a few excerpts of comments from the agencies' managed resources affected by this proposal. You can find the entirety of agency and public comments here; this includes comments from the Coalition for Sonoran Desert Protection:

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

Please consider both agency and public concerns and reconsider your position and make a public stand against the West Option. Thank you.

Sincerely,



Carolyn Campbell
Co-Executive Director