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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 ❊ 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 ❊ Society for Ecological Restoration ❊ Southwestern Biological Institute ❊ Tortolita Homeowners Association ❊ Tucson Audubon Society ❊ Tucson Herpetological Society ❊ Tucson Mountains Association ❊ Wildlands Network

July 4, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg*. We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection and the undersigned organizations.

Overview

In summary, we are in strong opposition to the Recommended Alternative route identified in the I-11 Tier 1 DEIS ("DEIS"). Our opposition is rooted in the major negative environmental and economic impacts that would inevitably occur if the Recommended Alternative route is successfully built and our belief that other transportation alternatives, including improving and expanding existing interstates, a focus on multi-modal solutions, and the inclusion of expanded rail service, could more effectively achieve the goals identified in the DEIS.

The Recommended Alternative route would have grave and devastating impacts to Pima County that cannot be adequately mitigated. These include:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation's Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County's Conservation Lands System.
- Impacts to planned mitigation lands for Pima County's Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

- Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona's Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.
- Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water's CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- Impacts to Tucson's businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
- Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
- Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.

We believe that these impacts cannot be adequately mitigated.

Purpose and Need

First and foremost, we strongly believe that ADOT and FHWA have failed to clearly and thoroughly demonstrate the need for construction of an entirely new freeway, based on the best available science and data. ADOT and FHWA should analyze not only the most current transportation and growth models and current and projected traffic volumes, but also changing transportation modes. For example, if the Mariposa Point of Entry was fully staffed and operational 24 hours a day (which it currently is not), the currently required overnight parking would be reduced, spreading out traffic volumes throughout the day (and also decreasing air pollution since refrigerated trucks have to stay running all night long while they are parked), and negating the need for this proposal at all. Additionally, autonomous truck testing is currently occurring in southern Arizona, is expected to continue, and could safely accommodate truck traffic at night or in a designated lane. [1]

The following planned projects should be analyzed by ADOT and FHWA:

- Plans to continue widening Interstate 10.

[1] https://www.wired.com/story/embark-self-driving-truck-deliveries/
https://tucson.com/business/pcc-tusimple-team-up-to-offer-self-driving-truck-operations/article_fb05bf3e-ba44-5dfd-ab23-dd6975cd509a.html

https://www.tucsonweekly.com/tucson/hands-off-the-wheel/Content?oid=25111164

- Elements of ADOT's 2017-2021 Five Year Plan to include, but not be limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.
- ADOT's 2011 "State Rail Plan," which was developed to address the needs of both freight and passengers.[2]

Also, of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of $54 million secured in a highway grant for ADOTs I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation's competitive FASTLANE program. Tucson Mayor Rothschild said, "Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that's very good news for Tucson, Phoenix and the state as a whole."[3]

Concerns with the overall NEPA process

We have serious concerns about the larger NEPA process and the premature identification of a "Recommended Alternative" route without adequate scientific and economic analysis and environmental studies. We question the ability of the involved agencies to present thorough information to the public about the myriad impacts of the Recommended Alternative route, and other considered alternatives, given the inadequate analysis presented in the DEIS. **We fully support and incorporate by reference the full comments on the I-11 DEIS submitted by the National Parks Conservation Association in July 2019, including a more detailed analysis on this issue.**

Major Environmental Impacts from the Recommended Alternative Route

Impacts to Federal and Local Protected Areas

The Recommended Alternative route would have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the significant biological and cultural resources they contain. The Recommended Alternative route would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County's federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan, which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and *mitigation lands in Avra Valley are critical to its long-term success with special emphasis on riparian areas*. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014, and this HCP is currently under

[2] See: https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0. This rail plan was based off of this study completed in 2010: https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0

[3] See http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson.

review. Meanwhile, Tucson Water's operations in Avra Valley are planned and conducted as if the HCP is already in full effect. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are as important to consider as federal conservation lands in Pima County. Unfortunately, impacts to local conservation lands have not been adequately addressed and analyzed in the documents related to this process, including the DEIS. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their federal Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are in Avra Valley and directly in the path of the Recommended Alternative route. It is disappointing to see a total lack of acknowledgement of these important local conservation lands in the DEIS and in recent public presentations and materials - any review of environmental impacts should address impacts to local conservation lands in detail, particularly in light of the fact that these protections are a result of a federal Incidental Take Permit.

Impacts to Wildlife Linkages

The Recommended Alternative route 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 developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.[4]

In general, 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 attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the

[4] Arizona Wildlife Linkages Assessment: https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages

Pima County Wildlife Connectivity Assessment:
http://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf

isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, wildlife genetic health, and overall ecosystem resilience in this area.

Impacts to local wildlife linkages are not adequately addressed in the DEIS and adequate mitigation for impacts resulting from the Recommended Alternative route are not possible.

Impacts to Pima County's Conservation Lands System

The Recommended Alternative route would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first 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 required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AGFD, 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 (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. **We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS are not adequately addressed in the DEIS. The Recommended Alternative route would damage CLS mitigation lands to such an extent that the integrity of Pima County's federal ITP permit would be compromised. Again, adequate mitigation for these impacts is not possible.**[5]

Impacts to Riparian Habitat

The Recommended Alternative route would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest

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[5] Pima County's Conservation Lands System Map and Policies: https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Sciece/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf

The full text of the MSCP, Annual Reports, maps, and other important information can be found at: http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=52674

More information on Pima County's Sonoran Desert Conservation Plan can be found at: http://webcms.pima.gov/government/sustainability_and_conservation/conservation_science/the_sonoran_desert_conservation_plan/

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."[6]

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of 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 developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS's IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. 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.

The lack of consideration of the certainty of flooding in the Altar and Avra Valleys and the subsequent isolation of people and properties from public health and safety responders, not to mention the potential costly relocation of existing infrastructure for the CAP canal, Tucson Water, Marana Water and other regional water providers, numerous El Paso/Kinder Morgan boosting stations, and various electric utility substations is just one example of the flawed NEPA process. This woeful lack of analysis of social, cultural, scientific and economic impacts in the choice of an alternative without adequate due diligence is negligent and should be considered a fatal flaw. This DEIS puts the cart before the horse and would have dire consequences for the region.

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally "endangered" or "threatened," those identified by the state of Arizona HabiMap (www.habimap.org) as "species of conservation concern or species of economic and recreational importance," and those identified by Pima

[6] http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf

County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

Aberts towhee
Bell's vireo
Western burrowing owl
Cactus ferruginous pygmy-owl
Western yellow-billed cuckoo
Swainson’s hawk
Rufous-winged sparrow
Giant spotted whiptail
Tuson shovel-nosed snake
Pima pineapple cactus
Nichol turk’s head cactus
California leaf-nosed bat
Mexican long-tailed bat
Pale Townsend’s big-eared bat
Lesser long-nosed bat
Merriam's mouse
Jaguar
Ocelot

Specific impacts to the Tucson shovel-nosed snake
The Tucson shovel-nosed snake (*Chionactis annulata klauberi*) is a small colubrid adapted to the sandy loams of the northeastern Sonoran Desert region of central and southeastern Arizona. It was petitioned for listing as “threatened” or “endangered” under the US Endangered Species Act (ESA) based on its habitat specialization in sandy desert flats subject to agricultural conversion and urban sprawl and its disappearance from the Tucson region (Center for Biological Diversity 2004). The subspecies was defined based on the strong infusion of black pigment on the red crossbands, which may enhance both coral snake mimicry and background-matching via flicker-fusion (Mahrdt et al. 2001). Its geographic range was described by Klauber (1951) and Cross (1979) and additional genetic analysis by Wood et al. (2008, 2014) supported continued recognition of the subspecies but did not define its distributional limits.[7]

[7] Mahrdt, C.R.; Beaman, K.R.; Rosen P.C.; [et al]. 2001. Chionactis occipitalis. Catalog of American Amphibians and Reptiles. 731: 1–12.

Klauber, L.M. 1951. The shovel-nosed snake, Chionactis with descriptions of two new subspecies. Transactions of the San Diego Society of Natural History. 11: 141–204.

Cross, J.K. 1979. Multivariate and univariate character geography in Chionactis (Reptilia: Serpentes). Dissertation. Tucson, AZ: The University of Arizona. 517 p.
http://arizona.openrepository.com/arizona/bitstream/10150/298514/1/azu_td_7916875_sip1_m.pdf [accessed February 2, 2018].

In 2014 the U.S. Fish and Wildlife Service rejected the snake for ESA listing based on an incorrect range map for the subspecies that included geographic areas within a sister taxon, *C. a. annulata* (USFWS; 2014). In 2018, Bradley and Rosen (in press) produced a more accurate distribution model for the species based on published genetic and distributional data (Figure 1).[8] They found that 39% of its habitat has been lost to urban development and agriculture and the remaining habitat is in geographically isolated pockets with no genetic connectivity to each other.

The I-11 Recommended Alternative route would have dire consequences for the remaining population of the Tucson shovel-nosed snake through road strikes and further habitat fragmentation. The highway would bisect some of the last intact habitat for the subspecies, including occupied territory within the Avra Valley. Another example of this is evident in the areas between Gila Bend and Maricopa, within and adjacent to the Sonoran Desert National Monument. This has been a reliable place to still see the snake and several individuals have been recorded along highway 238. The Recommended Alternative route would cut through this habitat block and this area would become a population sink as snakes and other wildlife, venturing outside of the monument, would be crushed by trucks and cars.

Further analysis of impacts to the Tucson shovel-nosed snake needs to be completed by the agencies to adequately understand the impacts of corridor alternatives.

Wood, D.A.; Meik, J.M,; Holycross, A.T.;[et al.]. 2008. Molecular and phenotypic diversity in the Western Shovel-nosed snake, with emphasis on the status of the Tucson Shovel-nosed snake (Chionactis occipitalis klauberi). Conservation Genetics. 9: 1489–1507.

Wood, D.A.; Fisher, R.N.; Vandergast, A.G. 2014. Fuzzy Boundaries: Color and Gene Flow Patterns among Parapatric Lineages of the Western Shovel-Nosed Snake and Taxonomic Implication. PLoS ONE 9(5): e97494.

[8] U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office. 2014. Species Status Report for the Tucson Shovel-Nosed Snake. [Online]. 78 p. Available: https://www.regulations.gov/document?D=FWS-R2-ES-2014-0035-0002.

Bradley, C.M. and Rosen, P.R. In Press. Defining suitable habitat and Conservation Status for the Tucson shovel-nosed snake (*Chionactis annulata klauberi*) in the Sonoran Desert. Biodiversity and Management of the Madrean Archipelago IV conference proceedings.

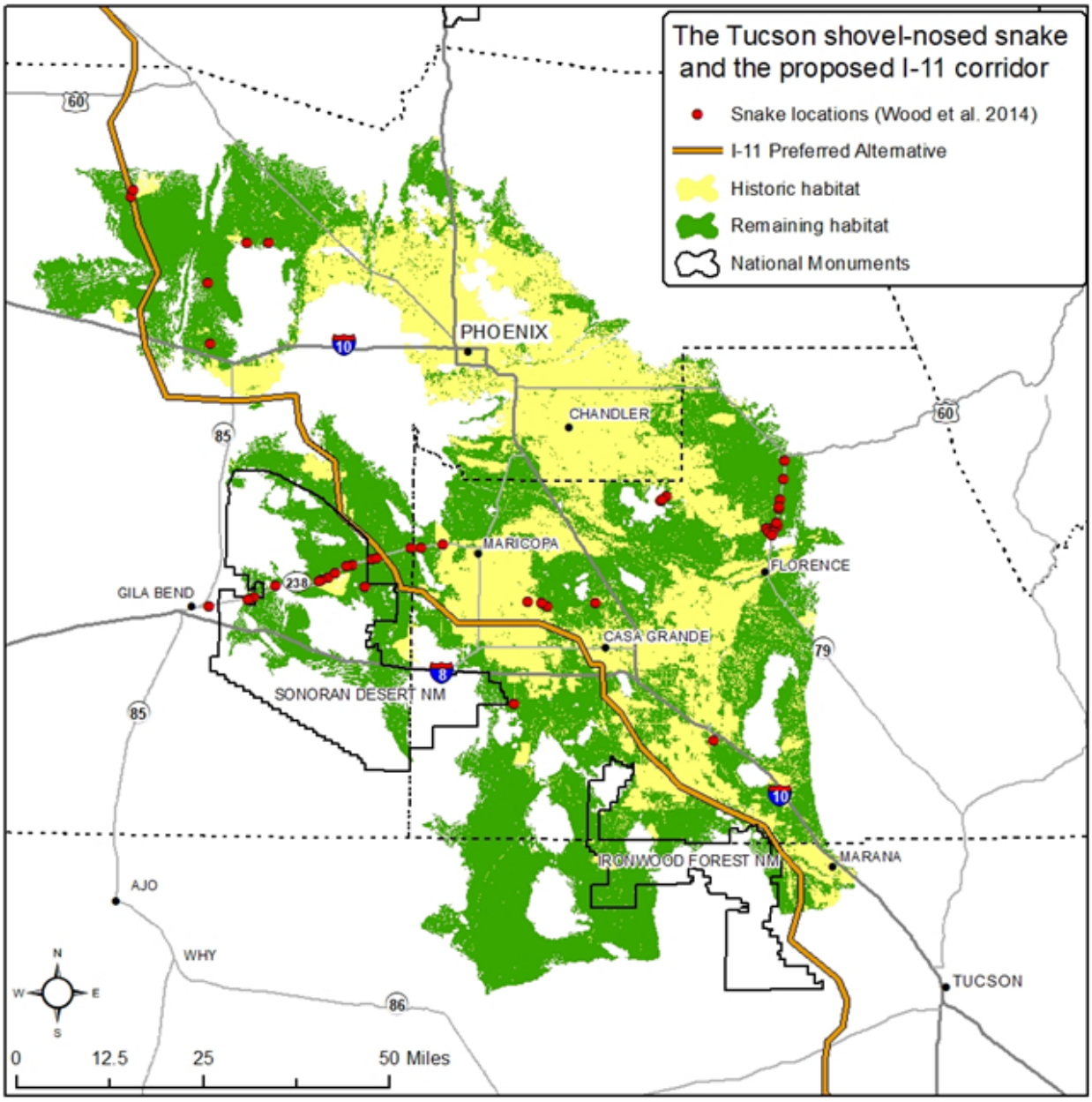

Figure 1: Historic and remaining habitat for the Tucson shovel-nosed snake and the I-11 Recommended Alternative route.

Impacts from noise and light pollution

The Recommended Alternative route would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they use through noise and light pollution. The Recommended Alternative route would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights, street lighting, and from reasonably foreseeable future commercial and residential development.

Impacts to the economy

The Recommended Alternative route runs adjacent to some of southern Arizona's long-standing economic powerhouses, such as the Arizona-Sonora Desert Museum, Saguaro National Park West, and Old Tucson. It also comes perilously close to emerging economic engines such as Ironwood Forest National Monument.

A May 28, 2019 press release directly from Saguaro National Park and the National Park Service stated that, "957,000 visitors to Saguaro National Park in 2018 spent $62.1 million in communities near the park. That spending supported 866 jobs in the local area, $31.3 million in labor income and had a cumulative benefit to the local economy of $90.9 million dollars." The Recommended Alternative route is located within 1,300 feet of the boundary of Saguaro National Park and will have unmitigable impacts on the visitor experience, including increased noise, light, haze and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of viewsheds. None of these impacts can be adequately mitigated.

The Recommended Alternative route is also located within 400 feet of the boundary of Ironwood Forest National Monument, an increasingly popular national monument supported by a robust and active group of volunteers and land managers. A new visitor kiosk was recently installed at IFNM at the Agua Blanca portal and the annual "Meet the Monument" event grows every year, with increasing numbers of participants every year. Building a freeway next to these protected public lands would cause irreparable harm to a place that is gaining momentum and actively investing in the visitor experience.

On April 17, 2019, local newspaper the AZ Daily Star reported on a recent U.S. News and World Report article that identified the Arizona-Sonora Desert Museum as one of the best 30 zoos nationwide. The Recommended Alternative route is located within approximately a half-mile of the Arizona-Sonora Desert Museum. Construction of this route would cause increased noise, light, and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of the viewshed at the museum. None of these impacts can be adequately mitigated.

The Recommended Alternative route would also drive traffic AWAY from Tucson's downtown and growing business districts that rely on traffic from I-19 and I-10 to survive. The City of Tucson resolution adopted unanimously by the Mayor and Council on June 19, 2019 clearly states opposition to the Recommended Alternative route and includes the following statements:

> "...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.
>
> ...Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination.

> ...In April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district.
>
> ...Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics.
>
> ...Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations.
>
> …[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.
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> …[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."

These are all economic arguments for either the No Build alternative or co-locating I-11 with I-19 and I-10 and demonstrate the grave economic consequences to the City of Tucson from the Recommended Alternative route. It is impossible to mitigate for these impacts to Tucson's economy and water supply.

Last, the DEIS needs to improve its analysis of the far-reaching impacts to local governments from building a brand-new freeway in a currently rural area. The Recommended Alternative route would lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other infrastructure and services, the cost of which would likely be borne by local governments such as the City of Tucson, Town of Marana, and Pima County.

Cost of considered alternatives

Our interpretation of the cost of considered alternatives in the DEIS indicates that the Recommended Alternative route would cost approximately $3.4 billion MORE to construct than the Orange Alternative that co-locates I-11 with I-19 and I-10 in the Tucson region. This estimate is based on information in Table 2-8 on page 2-33 of the DEIS. For Section A-F2, the Green Build Alternative construction costs are estimated to be $3,998,431,000 and the Orange Build Alternative construction costs are estimated to be $585,899,000. This leads to the conclusion that it will cost approximately $3.4 billion more to construct the Green Build Alternative. **We are also unclear why the DEIS does not clearly outline the costs of the Recommended Alternative route (blue on maps), rather leaving it up to the reader to somehow interpret the costs from the other identified routes and where they overlap with**

the Recommended Alternative route. The public should be given clear information for comparison and not be left to make unsure inferences from the incomplete data presented.

One other example of where the DEIS states the costs of considered alternatives in a confusing and incomplete way is in the following section:

> *Errata 4.5.3*
> Tunneling – Placing portions of the proposed Project in a tunnel was considered in the property-specific avoidance analysis (Section 4.4.3) as a means to avoid potential impacts to clusters of properties and Historic Districts. FHWA determined that tunneling could result in a use of one or more Section 4(f) properties and, therefore, is not an avoidance alternative. However, even if a way of avoiding use of Section 4(f) properties were to be found, the cost estimate for placing I-11 in a tunnel in Downtown Tucson is approximately $3.5 to $5.1 billion, compared to $240 million for the at-grade concept and $1 billion for the elevated concept. The extraordinary cost for tunneling indicates that, while tunneling may be feasible, it is not prudent (Avoidance Analysis Factor 4).
> Elevated Structures – Elevating I-11 in Downtown Tucson to avoid impacting Section 4(f) properties was considered in the property-specific avoidance analysis (Section 4.4.3.2 and 4.4.3.3). Although the elevated lanes could avoid direct impacts on adjacent Section 4(f) properties, noise and visual impacts would result in adverse effects to historic buildings and structures. Deep excavations for the elevated structure foundations would impact archaeological resources. For these reasons, an elevated lanes alternative through Downtown Tucson is not an avoidance alternative. The elevated alternative also would impact businesses and residences that are not protected by Section 4(f) and would add $1 billion to the overall capital cost of the Orange Alternative.

It is unclear what specifically the "$240 million" is referring to in terms of the specific section of highway considered for an at-grade concept. It should also be noted that even though $1 billion was added to the Orange Alternative in order to elevate I-11 through downtown Tucson, the capital costs would still be $2.4 billion LESS than the Recommended Alternative route.

In general, we are disappointed with the presentation of the cost of considered alternatives - they are difficult to interpret and should be more clearly and conclusively discussed so compared costs of alternatives are clear to the reader. The examples highlighted above are not exhaustive by any means and we recommend a thorough overhauling of this entire section of the DEIS.

Inadequate 4(F) analysis
The comparison between impacts to the Tucson Mitigation Corridor (TMC) and impacts to the seven historic properties likely to be used if the Orange Alternative is chosen are inadequate as presented in the DEIS.

Use of programmatic "net benefit" evaluation for TMC is inappropriate
Conducting a "net benefit" programmatic evaluation of the proposed use of the TMC is completely inappropriate for this 4(f) property. First, the federal regulations that govern 4(f)

evaluations make clear that the use of programmatic evaluations like the "net benefit" evaluation are to be used only "for certain minor uses of Section 4(f) property." (23 CFR 774.3(d)) Additionally, per agency guidance, the "net benefit" must be realized on the 4(f) property itself; promising off-site mitigation to offset impacts to a 4(f) property is not the same thing. According to FHWA guidance, a "'net benefit' is achieved when the transportation use, the measures to minimize harm, and the mitigation incorporated into the project results in an overall enhancement of the Section 4(f) property… A project does not achieve a "net benefit" if it will result in a substantial diminishment of the function or value that made the property eligible for Section 4(f) protection."[9]

There is simply no way to achieve a "net benefit" on this 4(f) property, as the use proposed here will, without a doubt, diminish - if not entirely undermine - the ability of the TMC to provide landscape connectivity for wildlife movement. This is especially true considering that this property is itself serving as mitigation for a previous linear project that impacted landscape connectivity in this same area. Regardless of the off-site mitigation promised, it is unlikely that this property will be able to continue to serve as mitigation for that previous project, should this proposed use be approved. **For these reasons, the use of the "net benefit" evaluation for the TMC is simply indefensible. The agencies should conduct an individual evaluation on the TMC property and revise the entire *Draft Preliminary Section 4(f) Evaluation* to consider that individual evaluation.**

Assessment of 4(f) property uses relies on inconsistent information

Because the agencies relied on the incorrect assumption that a "net benefit" would be achieved for the TMC 4(f) property, the DEIS provides no information whatsoever on the actual impacts that may be inflicted on the TMC. No baseline information on the TMC is provided and no information on potential impacts is provided. Without this information, there is no way for the reader to understand what a "net benefit" even means in this context; thus, it is inappropriate to leave this information out. However, because net benefit is inappropriate, it is imperative that the EIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

For example, Google imagery does not provide adequate information for assessing historic integrity and architectural significance for numerous reasons, and there are other far more valid approaches to evaluating such properties that the agencies could have used instead. Acknowledging one of the many pitfalls of this approach, the DEIS admits that "many [properties] were classified as possibly eligible simply because the Google imagery did not provide a clear view."

In addition, the DEIS is inconsistent in analyzing the costs and feasibility of tunneling through downtown Tucson but does not include a similar analysis of the costs and feasibility of tunneling under the entire 4(f) Tucson Mitigation Corridor.

[9] "Section 4(f) Evaluation and Approval for Transportation Projects that Have a Net Benefit to a Section 4(f) Property." Federal Highway Administration Environmental Review Toolkit. https://www.environment.fhwa.dot.gov/legislation/section4f/4f_netbenefits.aspx.

The DEIS is inconsistent in how it presents information related to the assessment of 4(f) properties. One example of this can be found in a comparison of how information regarding the TMC is represented versus how information regarding the downtown Tucson historic properties is represented. While it is technically true that 15% of the TMC acreage would be within the build corridor (453 out of 2958 acres), far more than just 15% would actually be impacted, considering the purpose for which the TMC was designated (providing landscape connectivity for wildlife movement). In contrast, the EIS asserts that 100% (3 of 3 acres) of the Manning House would be "used;" however, the document goes on to say, "Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected." (EIS at 3.7-24.) Therefore, while 100% of this historic property would be within the corridor, the EIS makes clear that the impact is not 100%. However, with the TMC no parallel consideration of actual impacts is given.

Reliance on insufficient information to compare each Alternative's potential use of 4(f) properties.
Agencies are required to "identify any methodologies used and shall make explicit reference… to the scientific and other sources relied upon for conclusions in the statement." (40 CFR 1502.24.) It has long been established that agencies must articulate "a rational connection between the facts found and the choice made." *Motor Vehicle Mfrs. Ass'n of the U.S. v. State Farm Mut. Auto Ins. Co.,* 463 U.S. 29, 43 (1983).

The flaws resulting from the "net benefit" assumption for TMC aside, the validity of some of the information used to inform the comparison of 4(f) properties is extremely questionable. The information provided for each property is insufficient, in some cases contradictory, and is undermined by inadequate, contradictory information about the properties being compared, and using different metrics.

Scope and Intensity of Impacts to 4(f) properties potentially impacted by Orange Alternative are artificially inflated, while no corollary information is provided for the 4(f) property potentially impacted by the Purple and Green Alternatives.
The DEIS's comparison of the number of 4(f) properties and their potential use under each alternative is confounding to the reader, precluding meaningful analysis.

Table 4-4 provides the percentage of each 4(f) property located within a build corridor for the various alternatives. However, this information seems to contradict information in the text, causing confusion regarding how potential use of each property is being assessed. This results in a significantly problematic apples-to-oranges comparison of the potential use of each property that tells the reader virtually nothing about the actual potential use of each 4(f) property.

For example, the potential use of the Manning House in downtown Tucson is unclear. First, the property description is inconsistent from one section to the next; on table 4-4 it is described as 1 acre in size, but on table 4-4 it is described as 3 acres in size. Second, Table 4-4 estimates that 100% of the property is subject to "potential use," but in the text on page 3.7-24 the DEIS

states, “Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected.” This indicates that the percentage of “potential use” is not the same as the percentage of the property potentially directly impacted, indicating that indirect impacts are part of the “potential use” consideration. Another example of this is Barrio Anita, where the percentage of the property subject to “potential use” is 85 percent. At the same time, the text states that out of 66 buildings identified in the Barrio Anita Historic District NRHP nomination, the Orange Alternative “could require land from four parcels with contributing residences along the west side of Contzen Avenue but not all of those houses might be directly affected” (EIS at 3.7-24). To make matters more confusing, elsewhere the text states, “The Orange Alternative could require… Removal of at least one historic residential structure adjacent to I-10 in Barrio Anita” (page 4-75). Again, the only explanation for the discrepancy between the percentage of potential use and the amount of land potentially directly impacted is that indirect impacts are considered in the percentage of potential use.

In contrast, the potential use of the TMC property does not appear to include indirect impacts. Table 4-4 shows that only 15% of the property is subject to potential use, with only the percentage of land directly impacted. However, the percentage of potential use would be far larger if indirect impacts are considered for this property, considering how severely compromised the TMC would be as a wildlife movement corridor if an interstate is routed along its entire western boundary or diagonally, from southeast to northwest, through the parcel. There is no explanation for why the TMC is not given the same consideration as the 4(f) properties it is being compared against.

Other discrepancies abound. Page 4-73 provides a list of seven 4(f) properties in downtown Tucson that are subject to potential use by the Orange Alternative, which includes the Barrio Anita Historic District and the David G. Herrera and Ramon Quiroz Park (formerly Oury Park). The analysis uses this number to compare the Orange Alternative’s potential impacts to 4(f) properties to those of the Purple and Green Alternatives, where only one property -- the TMC -- is subject to potential use. However, the text makes clear that Quiroz Park is a contributing property to the Barrio Anita Historic District, and the Park is not listed separately on Table 4-2 or Table 4-4. Inadvertently or otherwise, listing Quiroz Park separately only in this context artificially increases the number of properties potentially impacted by the Orange Alternative and skews the comparison with the Purple and Green Alternatives.

Information provided in Least Harm Analysis is so inadequate it precludes meaningful analysis

Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property
When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, “There is a low ability to mitigate the impacts of the Orange Alternative.”

In addition, on page 4-108 the DEIS states, "After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable…" Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation.
On page 4-96, the DEIS states, "As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property." This statement explicitly demonstrates skewing of the comparison.

Least harm analysis Factor 3: Relative significance of each Section 4(f) property
The DEIS asserts the following on page 4-97, "FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value." We strongly disagree with this outlandish statement and urge further evaluation of all Section 4(f) properties. This statement asserts that the entire Tucson Mitigation Corridor is equal to the parking lot of the Manning House, which is a ridiculous and erroneous assertion to make.

Least harm analysis Factor 6
Section 4(f) properties are defined in part as *"publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site)."* The Ironwood Forest National Monument was designated by Presidential Proclamation in June of 2000, under a new protective classification of federal Bureau of Land Management lands. We disagree with the conclusion in the DEIS (Appendix F) that fails to recognize Ironwood Forest National Monument as a Section 4(f) property.

Furthermore, the DEIS fails to consider the magnitude of adverse impacts on multiple properties not protected by Section 4(f). For example, for the Purple and Green Alternatives, this analysis must include the Ironwood Forest National Monument (see above), Tucson Mountain Wildlife Area, and Sonoran Desert National Monument. We believe these properties should be considered as 4(f) properties. However, even though these properties are not considered 4(f) properties, this does not mean there are no adverse impacts to them.

Consideration of other transportation strategies
The DEIS and the choice of the Recommended Alternative route overlooks other less costly options that would encourage the free flow of goods through our region. 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.

During the Scoping phase, we strongly recommended a more thorough analysis and consideration of these other transportation strategies that will also better equip our region to adapt to the growing impacts of climate change. Assessing the cumulative impacts of these options on congestion also needs to be more thoroughly considered in the DEIS. **We reiterate our request for this more thorough analysis in future planning efforts and this analysis be completed and shared with the public prior to designating a Preferred Alternative.**

Additional necessary studies
The following studies must be completed prior to designating a Preferred Alternative, with the results communicated to the community 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 Recommended Alternative route. 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 Brawley/Los Robles wash system and 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 Recommended Alternative route. 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 the 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. Using such studies and designs would help us reduce impacts in Tucson's downtown and surrounding areas should co-location be further considered.

Other factors that must be more thoroughly analyzed for all corridor alternatives include how continued climate change, which is a reasonably foreseeable circumstance, will impact Arizona's water resources and projected population growth; public health implications,

including increased air pollution and the proliferation of valley fever; and long-term impacts on local and regional land-use plans.

The Recommended Alternative route through Avra Valley would facilitate commercial and residential development in this area. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.

Considering the identified Recommended Alternative route in the DEIS, we argue that either the No Build alternative or improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental and larger community impacts**. Because of this, we stand in strong opposition to the Recommended Alternative route.**

Local government opposition

In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 (attached) 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."

Additionally, in April 2019 Pima County Board of Supervisors' Chair Richard Elías and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, "The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through 'invaluable Sonoran Desert areas.' That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it" (attached). We strongly concur with Pima County's elected officials and their 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.

On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, "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 the project."

On May 18, 2019, Arizona District 3 Congressman Raúl Grijalva submitted comments on the DEIS voicing his opposition to the Recommended Alternative route. We have attached the Congressman's letter as well.

Thank you for the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg***. Given the far-reaching and devastating impacts that the Recommended Alternative route would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, we express our strong opposition to the Recommended Alternative route and feel that should additional capacity be warranted, that reconfiguration of existing highways is the only acceptable Alternative. This DEIS is replete with inadequate analyses and is, in and of itself, a fatal flaw.** We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jodi Netzer, Director
Tucson Entrepreneurs

Robin Clark *for*
Avra Valley Coalition

Tom Hannagan, President
Friends of Ironwood Forest

Louise Misztal, Executive Director
Sky Island Alliance

Barbara Rose, Project Coordinator
Safford Peak Watershed Education Team

Diana Hadley, Co-President
Northern Jaguar Project

Demion Clinco, President
Tucson Historic Preservation Foundation

Sandy Bahr, Chapter Director
Sierra Club - Grand Canyon Chapter

Meg Weesner, Chair
Sierra Club - Rincon Group

Emily Yetman, Executive Director
Living Streets Alliance

Kevin Gaither-Banchoff, Development Director
WildEarth Guardians

Peter Chesson, President
Tucson Mountains Association

Gayle Hartmann, President
Save the Scenic Santa Ritas

Robert Villa, President
Tucson Herpetological Society

Terry Majewski, Chair
Tucson-Pima Historical Commission

Ivy Schwartz, President
Community Water Coalition of Southern Arizona

Jonathan Lutz, Executive Director
Tucson Audubon Society

Nancy Williams, President
People for Land and Neighborhoods

Fred Stula, Executive Director
Friends of Saguaro National Park

Pearl Mast and Anna Lands, Co-Chairs
Conservation Committee
Cascabel Conservation Association

Randy Serraglio, Southwest Conservation Advocate
Center for Biological Diversity

Myles Traphagen, Borderlands Project Coordinator
Wildlands Network

Gary Kordosky, President
Gates Pass Area Neighborhood Association

Della Grove, President
Citizens for Picture Rocks

Jessica Moreno, President
Arizona Chapter of The Wildlife Society

Mike Quigley, Arizona State Director
The Wilderness Society

Robert Peters, Southwest Representative
Defenders of Wildlife

Attachments: April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson
Pima County Resolution No. 2007-343
City of Tucson Resolution No. 23051
May 2019 Letter from Rep. Raúl Grijalva (D-AZ)

ATTACHMENTS

April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson

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RICHARD ELÍAS
CHAIRMAN OF THE BOARD
COUNTY SUPERVISOR - DISTRICT 5

To Whom it May Concern:

The Pima County Board of Supervisors adopted Resolution No. 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through "invaluable Sonoran Desert areas." That remains the official position of Pima County government.

At the time, the proposal under consideration was for an Interstate 10 Bypass Freeway, but it was along the same suggested routes as the currently proposed Interstate 11. A "favored" route then, as now, was through Avra Valley.

A freeway through the Avra Valley or other parts of the delicate Sonoran Desert is not compatible with the county's landmark Sonoran Desert Conservation Plan or with its Sustainability Plan to combat climate change in line with the 2015 Paris Agreement.

A freeway would destroy sensitive habitat for many of the 44 unique species of concern that the Conservation Plan protects. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn.

The Sustainability Plan aims to steer the county government operations away from fossil fuel use and dependency, and a new freeway would promote increased fossil-fuel use, to the detriment of our air quality as well as to climate change.

A freeway through Avra Valley would impact severely and negatively such jewels and tourist areas as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Arizona-Sonora Desert Museum. It would diminish vastly the quality of life of thousands of Avra Valley residents.

The cost of buying land for and building an entirely new freeway would be tremendous, when we do not have enough funds to maintain properly our existing roads and highways. It would cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

An Interstate 11 would divert traffic away from existing businesses that depend on Interstate 10 and Interstate 19 traffic visibility for their survival.

A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it.

Sincerely,

Richard Elías, Chairman
Pima County Board of Supervisors

Sharon Bronson, District Three Supervisor
Pima County Board of Supervisors

RESOLUTION NO. 2007- 343

A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS IN OPPOSITION TO CONSTRUCTION OF AN INTERSTATE HIGHWAY LINK THAT BYPASSES TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

WHEREAS, Pima County has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel to this effort because of their greenhouse-gas and pollutant emissions, and therefore calls for the County to shift its fleet to use alternative fuels; and

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new controlled-access highway would be enormous, requiring the acquisition of thousands of acres of new rights of way, expenditures on high and rapidly increasing costs of concrete and asphalt, putting a tremendous burden on taxpayers and future highway users; and

WHEREAS, the production of the millions of tons of concrete and asphalt for this massive construction project would cause significant air pollution and greenhouse gas emissions, as would the operation of heavy machinery in the construction process; and

WHEREAS, a new controlled-access highway near or through Pima County on any route, would promote urban sprawl, causing local governments to incur large financial responsibilities for new infrastructure costs and force major changes to existing county land-use and zoning designations; and

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; 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 expanding capacity 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 that the Pima County Board of Supervisors:

1. Opposes 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, archeological, and urban form impacts could not be adequately mitigated.

2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.

3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding 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.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.

Chairman, Pima County Board of Supervisors

ATTEST:

Clerk of the Board

APPROVED AS TO FORM:

Deputy County Attorney

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

REVIEWED BY:

_____
CITY MANAGER

MR/dg
6/13/19

RAÚL M. GRIJALVA
3RD DISTRICT, ARIZONA

COMMITTEE ON NATURAL RESOURCES
CHAIRMAN

COMMITTEE ON EDUCATION AND LABOR
HIGHER EDUCATION AND WORKFORCE INVESTMENT SUBCOMMITTEE
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May 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

Also emailed to: I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Dear Mr. Van Echo,

I would like to take this opportunity to provide input during the public comment period on the Draft Tier 1 EIS referenced above.

I am concerned that the current comment period is too short for a comprehensive review of this extremely large document (762 pages plus appendices). I request that the comment period be extended for a total of 120 days—which is common for projects of this magnitude and controversy—making the revised due date for comments August 3, 2019.

I support efforts to physically connect Arizona and Nevada via transportation corridors to facilitate Canadian and Mexican trade routes. The City of Tucson and the metro region of Pima County would benefit most by enhancing existing infrastructure that already provides the connection: Interstate 10 and 19, or option "A" and "B" that have been included in your route studies.

I am **very concerned** that a hybrid option of routes going through Altar and Avra Valleyhas instead been chosen for the preferred alternative in the Draft Tier 1 EIS. This route would necessitate building new interstate. This route would negatively impact rural communities in Avra Valley, Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and other protected open spaces and wildlife corridors. I pointed this out during the scoping process in a June 1, 2017, letter to project manager Jan Van Echo. For the record I would like to repeat my concerns:

> This proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values, and quality of life for residents of that community. Even a limited access roadway would still open this mainly undeveloped area to massive sprawl. Residents of my district affected by this option have called my office expressing these same concerns. Pima County voters have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, the Federal Highway Administration and the Arizona Department of Transportation must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concerns expressed

all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

One explanation for this conclusion is that a Tier 1 analysis is not enough for a federal process to come up with the better route alternative. The tiering of the required environmental compliance means that the decision is not informed by the best information and that vague promises of future mitigation is enough to allow the incredible decision to bisect an important wildlife mitigation area with a major freeway. This calls into question the Department of Transportation's unusual practice of coming to a decision without the full environmental compliance that most other federal projects regularly require.

A proposed MOU giving the state environmental compliance responsibilities for federal highway projects in Arizona, which would include the Tier 2 study, further demonstrates the inappropriate fragmentation of planning and compliance this project will receive, especially compared to projects with this sort of impact on protected lands that our community would normally expect.

Another issue of concern is the regularity with which this route keeps re-surfacing. Voters overwhelmingly voted against a ½ cent sales tax that would have funded a similar project back in the mid-1980s. The Picture Rocks community along with many other Pima Country residents and organizations have and continue to vocally oppose it, yet this route keeps being promoted as the preferred option.

Very little is being done to address alternatives to continuous freeway expansion, such as facilitating the expansion and use of intermodal shipping yards, facilitating the creation of public rail transportation lines as alternatives to continuously promoting freeway development—especially in pristine habitat corridor areas. I consistently remain opposed to any highway plan that opens up the Avra valley to widespread environmental destruction.

The possible fast tracking of this project, despite information typically disseminated by the project's managers at public meetings that there is not current funding available, is concerning. While that may be currently true, this project is in conjunction with the Federal Highway Administration, I-11 and Intermountain West Corridor Study (IWCS) completed in 2014. With talk in Congress about developing an infrastructure spending package, the state appears to be attempting to remove all barriers to fast tracking this project once, and if, funding is available. If Congress is able to pass an infrastructure package, the voters will have no say, as planning will be completed, and routes will have been previously selected.

If the project's purpose is to provide a high-priority north to south transportation corridor to connect to major metropolitan areas and markets with Mexico and Canada, then I believe that the best option is using Interstate 10 and 19, which already includes metropolitan Tucson and protects the environmentally sensitive area west of Tucson.

Thank you for your time and the opportunity to provide input.

Sincerely,

Raúl M. Grijalva,
Member of Congress, (AZ-03)

Cc: Jan Van Echo, PE, ADOT I-11 Study Manager