



## Coalition for Sonoran Desert Protection

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July 8, 2016

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  
Connections  
Center for Environmental  
Ethics  
Defenders of Wildlife  
Desert Watch  
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  
Genius Loci Foundation  
Native Seeds / SEARCH  
Northwest Neighborhood  
Alliance  
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  
Sky Island Watch  
Society for Ecological  
Restoration  
Sonoran Permaculture  
Guild  
Southwestern Biological  
Institute  
Tortolita Homeowners  
Association  
Tucson Audubon Society  
Tucson Herpetological  
Society  
Tucson Mountains  
Association  
Wildlands Network  
Women for Sustainable  
Technology

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

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

To Whom It May Concern:

The Coalition for Sonoran Desert Protection appreciates the opportunity to provide scoping comments for the *Interstate 11 Tier 1 Environmental Impact Statement (EIS), Nogales to Wickenburg*.

We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 34 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) protecting and conserving 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.

In summary, our scoping comments highlight the need for further evaluation of the purpose and need for this project and major environmental impacts that should be considered statewide and particularly in Pima County as this study area is evaluated. Specifically, potential environmental impacts in Pima County 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; local conservation lands such as Tucson Mountain Park, planned mitigation lands for federal Incidental Take Permits and 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 and connectivity between large wildland blocks as described in Arizona's Wildlife Linkages Assessment, the Coyote-Ironwood-Tucson Wildlife Linkage, the Ironwood-Picacho Wildlife Linkage, and the 2012 Pima County Wildlife Connectivity Assessment conducted by the Arizona Game and Fish Department (AzGFD); and increasingly rare riparian habitat.

### **Purpose and Need**

First and foremost, we strongly believe that ADOT should clearly and thoroughly demonstrate the need for this corridor based on the best available science and data. This includes the most current transportation and growth models and current and projected traffic volumes. The analysis must include established plans to continue widening Interstate 10 and improving capacity from Mexico's Mariposa Port of Entry and the recent approval of ADOT's 2017-2021 Five Year Plan. Elements of this Five Year Plan that must be considered include, but are not 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.

Also of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of \$54 million secured in a highway grant for ADOT's 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."<sup>1</sup>

### **Major Environmental Impacts for Evaluation**

#### ***Impacts to Federal and Local Protected Areas***

The EIS must fully analyze the direct, indirect and cumulative impacts to all federal and local protected areas and the biological resources they contain in the entire study area. For example, in Pima County the study area for the EIS encompasses Avra Valley west of the Tucson Mountains. Any alignments considered in Avra Valley 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 federal Incidental Take Permits (ITPs) and Habitat Conservation Plans (HCPs) under development by the City of Tucson, Pima County, and the Town of Marana. The Pima County Multi-Species HCP was officially approved by the U.S. Fish and Wildlife Service (FWS) as published in the Federal Register on May 13, 2016, and the 30-year ITP will be voted on by the Pima County Board of Supervisors in September 2016. Tucson's Avra Valley HCP was submitted to the FWS in November 2014 and is currently under review. The Marana HCP is currently on hold.

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<sup>1</sup> See

<http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

In addition, the study area in Pima and Pinal Counties encompasses smaller, yet still vitally important, local protected areas such as Tortolita Mountain Park, the Hardy Wash system and Arthur Pack Regional Park, and others. All of these protected lands are public investments in conservation.

For the entire project, please note that reduced ecological values due to the effects of fragmentation by any proposed infrastructure developments, including highways, should be avoided to the greatest extent practicable; any unavoidable impacts should be minimized; and all impacts should be mitigated to the fullest extent where avoidance and minimization are deemed impossible.

### ***Impacts to Wildlife Linkages***

The EIS must fully analyze the direct, indirect and cumulative impacts to all of the identified wildlife linkages in the entire study area. For example, in Pima County 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 developed and implemented over the last 18 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded ADOT and AzGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. And most recently, AzGFD'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. Any Interstate 11 alternatives that are located in Avra Valley would also sever the Ironwood-Picacho wildlife linkage.

The study area also encompasses a highly threatened wildlife linkage between the Tucson and Tortolita Mountains and skirts the edge of another highly threatened wildlife linkage between the Tortolita and Santa Catalina Mountains. Both of these wildlife linkages have been the focus of substantial public investment in recent years by the state of Arizona, Pima County, and other local jurisdictions. In March 2016, the Sonoran Desert's first wildlife bridge, funded by Pima County's Regional Transportation Authority, was completed in the Santa Catalina-Tortolita Mountains wildlife linkage. Smaller wildlife underpasses are planned for Tangerine Road and Silverbell Road within the Tucson-Tortolita Mountains wildlife linkage. Impacts to these wildlife linkages in particular must be fully analyzed and mitigated for in the EIS.

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 any important movement area for wildlife, cannot be adequately mitigated off-site.

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

The EIS must fully analyze direct, indirect and cumulative impacts to Pima County's Conservation Lands System, which is the foundation of the county's federal ITP. All possible alignments of Interstate 11 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, AzGFD, 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 must be considered when analyzing any potential corridor alignments. All impacts to CLS acreage must be fully mitigated as close to the area of impact as possible, with habitat as good, or better, than that impacted.

### ***Impacts to Riparian Habitat***

The EIS must fully analyze direct, indirect and cumulative impacts to riparian habitat within the entire study area. Any potential Interstate 11 alignments, as demonstrated by the maps ADOT displayed at the public meetings, will 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>2</sup>

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<sup>2</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 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.

***Impacts to at-risk species***

The EIS must fully analyze the direct, indirect and cumulative impacts to all species or species habitat present in the project area, and especially those classified as federally "endangered" or "threatened," those identified by the state of Arizona [HabiMap](#) as "species of conservation concern or species of economic and recreational importance," and those identified by Pima County and FWS as "vulnerable" under the SDCP. 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
- 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

***Impacts from noise and light pollution***

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The EIS must thoroughly analyze the direct, indirect and cumulative impacts of noise and light pollution from any proposed alignments on resident and migratory wildlife and the wildlife habitats and corridors they utilize. The EIS must also thoroughly analyze any direct, indirect and cumulative impacts to 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, from light pollution, both from vehicle headlights and from reasonably foreseeable future commercial and residential development.

***Broader Impacts***

Other factors that must be analyzed include how continued climate change will impact Arizona's water resources and projected population growth; public health implications; environmental impacts; and long-term impacts on local and regional land-use plans.

Finally, the EIS must fully analyze the broader impacts of all alternative alignments. For example, any 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 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.

Additionally, a cost-benefit analysis of alternative(s) double decking I-19 and/or I-10 should be included in the EIS. This approach could reduce the cost of ROW acquisition and potentially avoid any new impacts in the Avra Valley. However, there would be increased environmental impacts from further fragmentation of the Tucson-Tortolita Mountains wildlife linkage corridor, which could be mitigated by construction of a wildlife crossing structure over I-10, as was recently successfully done on SR 77. The feasibility of such a structure has previously been discussed and accepted in principle by Pima County's RTA Wildlife Linkages Working Group, ADOT, AZ State Land Department, AzGFD, Pima County, Town of Marana, Coalition representatives, and others.

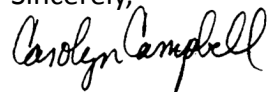
**Regardless, in considering a proposed Interstate 11 alignment between Nogales and Wickenburg, we argue that improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental impacts. The Coalition questions the purpose and need for a new interstate between Nogales and Wickenburg at all.**

***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 (attached). 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.

Thank you for the opportunity to provide scoping comments on the *Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg*. 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,

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

Carolyn Campbell  
Director