

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

May 7, 2019
Re: Comments on I11 study in Wickenburg area

Prepared by:

Dale Keiser
35600 S. Antelope Creek Road
Wickenburg, AZ 85390
Tel: 928 684 1013
rte@ibab.org

Study Team,

My wife Debbie and I attended your recent presentation in Wickenburg for the Tier 1 Study. It is safe to say that at first, we were shocked by the corridors we saw on your maps. But, after talking with several members of your team, we felt confident in the processes that you follow. We think we still have a good opportunity to make changes to the current Recommended Alternative.

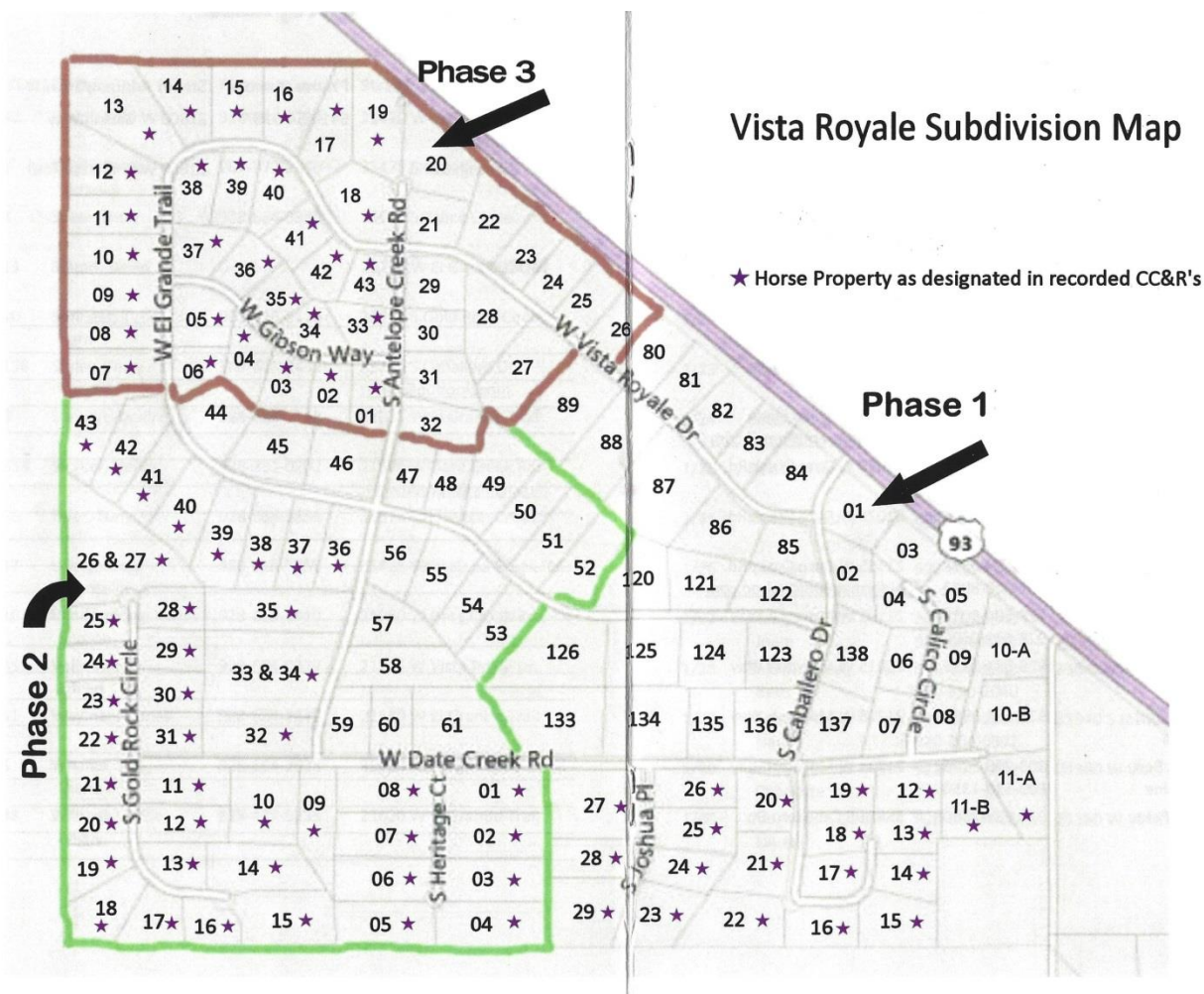
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VISTA ROYALE: My impression is that your team may not be familiar with our neighborhood, Vista Royale. That familiarity is key to understanding the lifestyle and wishes of the neighborhood.

See the following map of our subdivision. The subdivision is made up of 156 lots with lot sizes ranging from 2 acres to 5 acres. There are currently just over 100 homes. You can view the area from your satellite imagery and see most of the lots and the developed areas. Note that some of the lots have been combined by owners to give more space around their homes. Be aware also that some of the lots adjacent to developed properties are owned by the owner of the developed property and serve as even more “buffer” space. The Subdivision Map has an asterisk placed in the lots that are recorded as Horse Properties and were purchased at premium prices. Notice that these properties are to the west and south of the development nearest the open State Trust Land.

For many (probably all) of us, open space is a commodity that is very valuable. Also note from the imagery the size of the homes and outbuildings plus the extensive horse facilities.

Something that you don't see in the satellite imagery or the Subdivision Map is the number of homeowners who are avid outdoorsmen; hikers, bicyclists, and OHV operators who frequent the desert to the south and west of VR. This plus the open space is the reason that we live here.

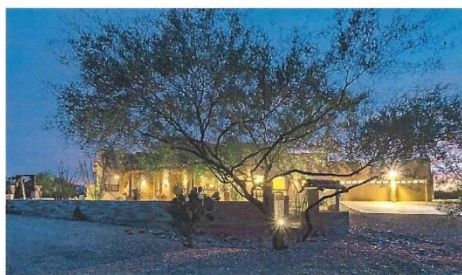


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\$870,000.

35650 Gold Rock Circle

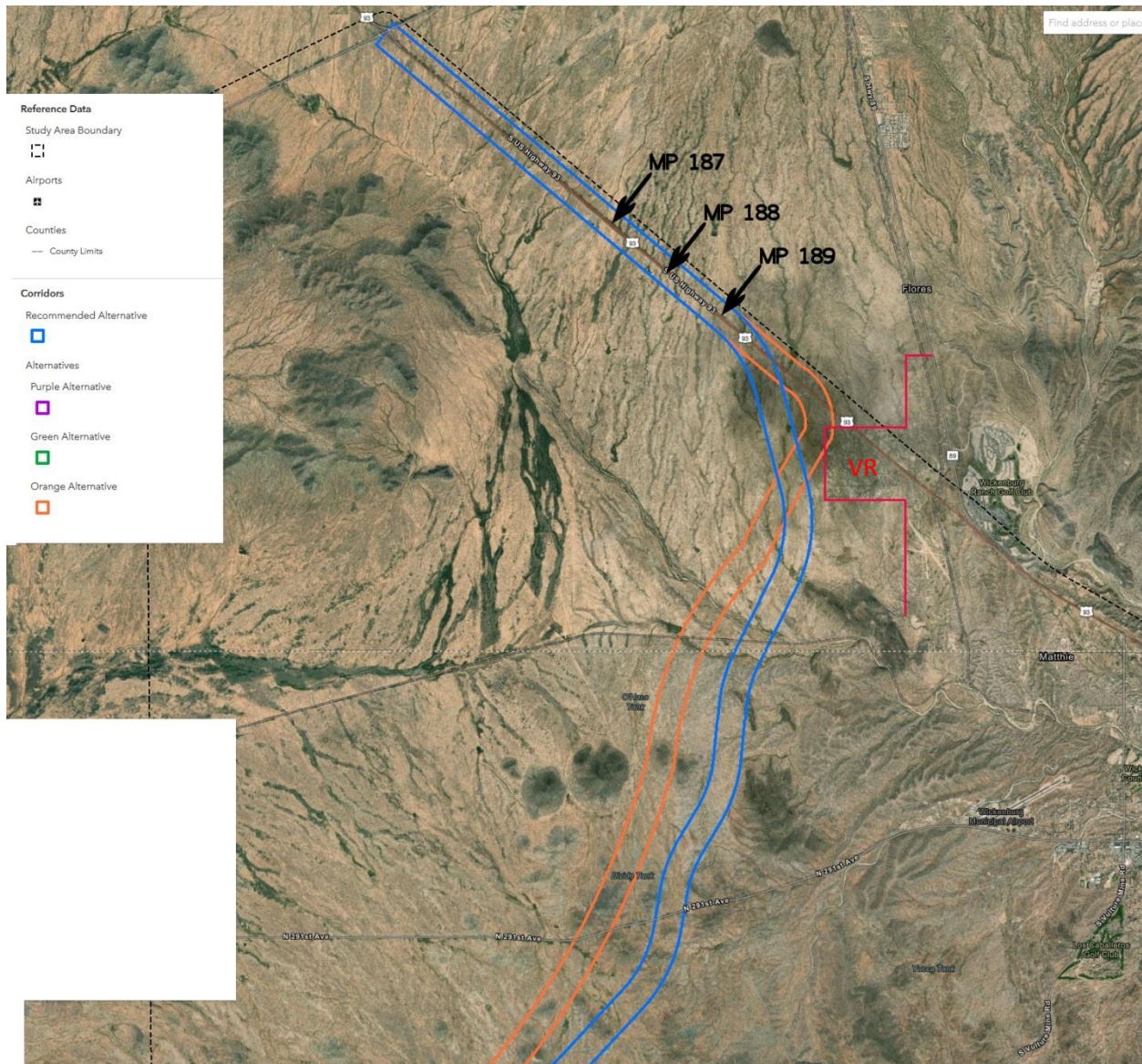
Master Suite + 3Br An Elegant 3,326



A RARE BEAUTY! Live the way you always dreamed it to be in in this Territorial 4Bedroom with 3Bath. Huge Kiva Poles Adorn Entrance and Open Living Nestled on Nearly 3 acres. Dining surrounded by Windows of Stunning Views. Enjoy the Luxury of the Master Bedroom Suite. All opening to Covered Patios Leading to Private Courtyards. A Masterful Gourmet Kitchen has More Views to Enjoy. A 3,326 SF Home with 3-4 Car Garage. Take Path to Detached Dual His/Her Shops, with AC! One is Plumbed for Easy Convert to the Guest House. His Shop Sports another 3car Gar. Complete with Elaborate Bath and Instant Hot Water. Venture on to the Tack Room and Hay Storage and Out to the Dual Mare Motel, Pipe Fenced Turnouts. Your Horses will Love the Gate to the Bordering State Land for Great Riding or Hiking! Landscaped with Mature trees and Plantings. MLS 5796554 NOW REDUCED !

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Notice the view from the huge windows and the price of the property. What would that view be and what would the price be if the “Gate to the Bordering State Land” led to I11 a few hundred feet away?



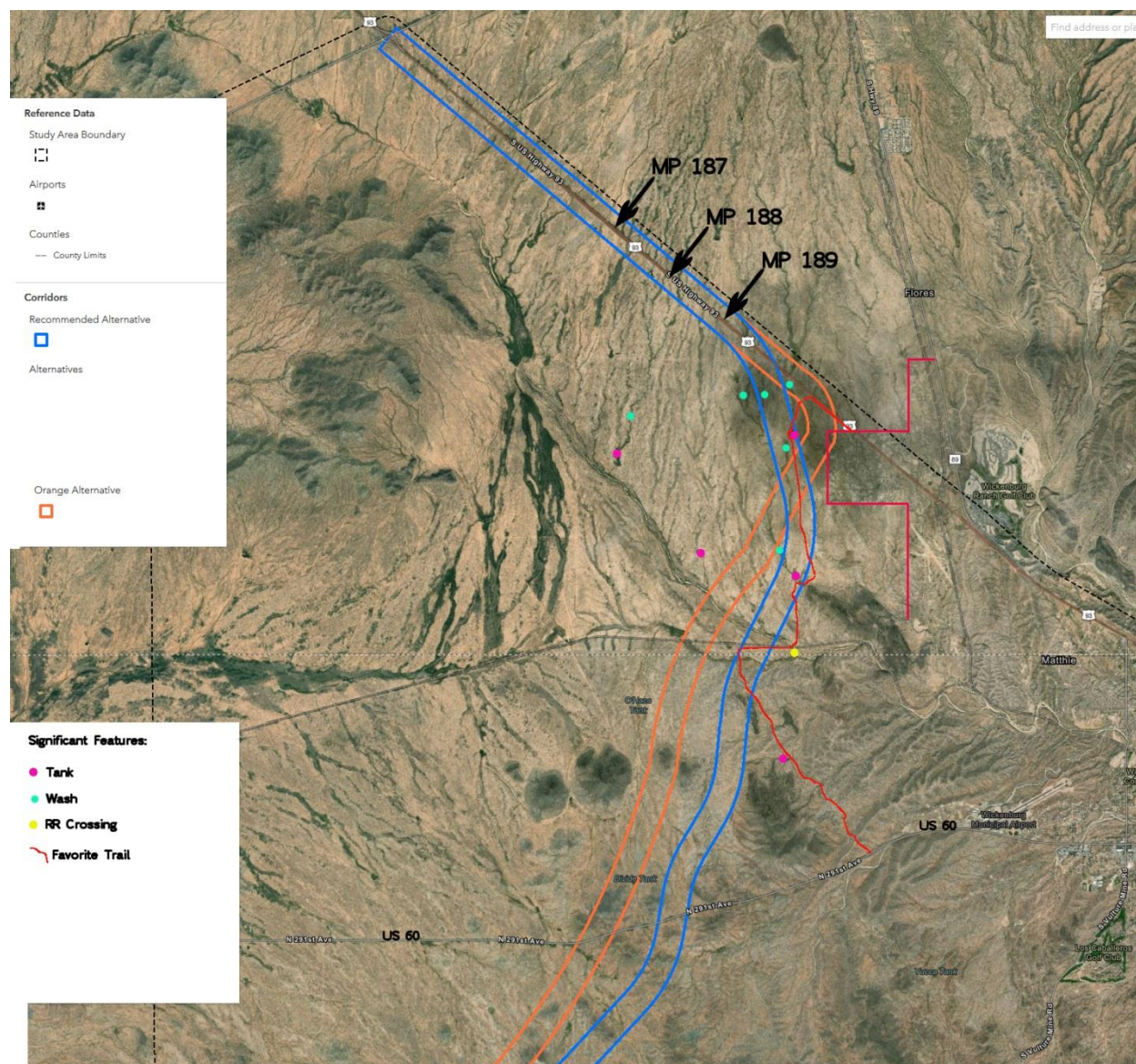
I11 Alternative Corridors. Mile Posts and Vista Royale outline added by the author.

THINGS FOR THE STUDY TEAM TO CONSIDER:

When the residents of Vista Royale look to the West and to the South, they see wide open spaces. They have purchased land here and they have built their dream homes here because of that openness, the scenic beauty, and its easy access.

The proximity of the Alternate routes provides a “wall” to the West as well as blocking trails for access to the South. If I11 is completed as it is currently defined, most if not all of the features that make VR special will be lost. Property values will certainly plummet. This is not an emotional reaction, it is fact.

The following map shows tanks and feeder washes that are important to the abundant local wildlife. The map also shows a trail that connects HWY93 to US60. This trail is used extensively by VR residents for its beauty, its challenge to OHV operators, its access to the TOW, and access to the whole Vulture Mountain area including the soon-to-be Recreation Park.



I11 Study Group Alternatives with “Significant Features” overlay

The only trail connecting HWY93 to US60 is shown on the above map’s legend as “Favorite Trail”. This connectivity exists now because of an old mining road, a ranch road, and a single

gated crossing under the railroad at the point designated by the yellow dot. That trail is destroyed by the current Recommended Alternative.

Note the number of Tanks near and within the Recommended Alternative corridor. These tanks are vital to the diverse and abundant wildlife in the area (another Vista Royale perk). The closeness of I11 will adversely impact that wildlife. I can't speak for the hunters, but I know that these tanks see a lot of action during bird seasons and we often see Javalina and deer watering there.

Tanks are located where they are because of the concentrated runoff of rainwater. With increased runoff comes increased erosion and deeper washes. Those deeper washes are noted on the map. Deeper washes increase construction complexity. They also provide better wildlife habitat.

CONSIDERATIONS FOR DEVELOPING THE VR ALTERNATIVE:

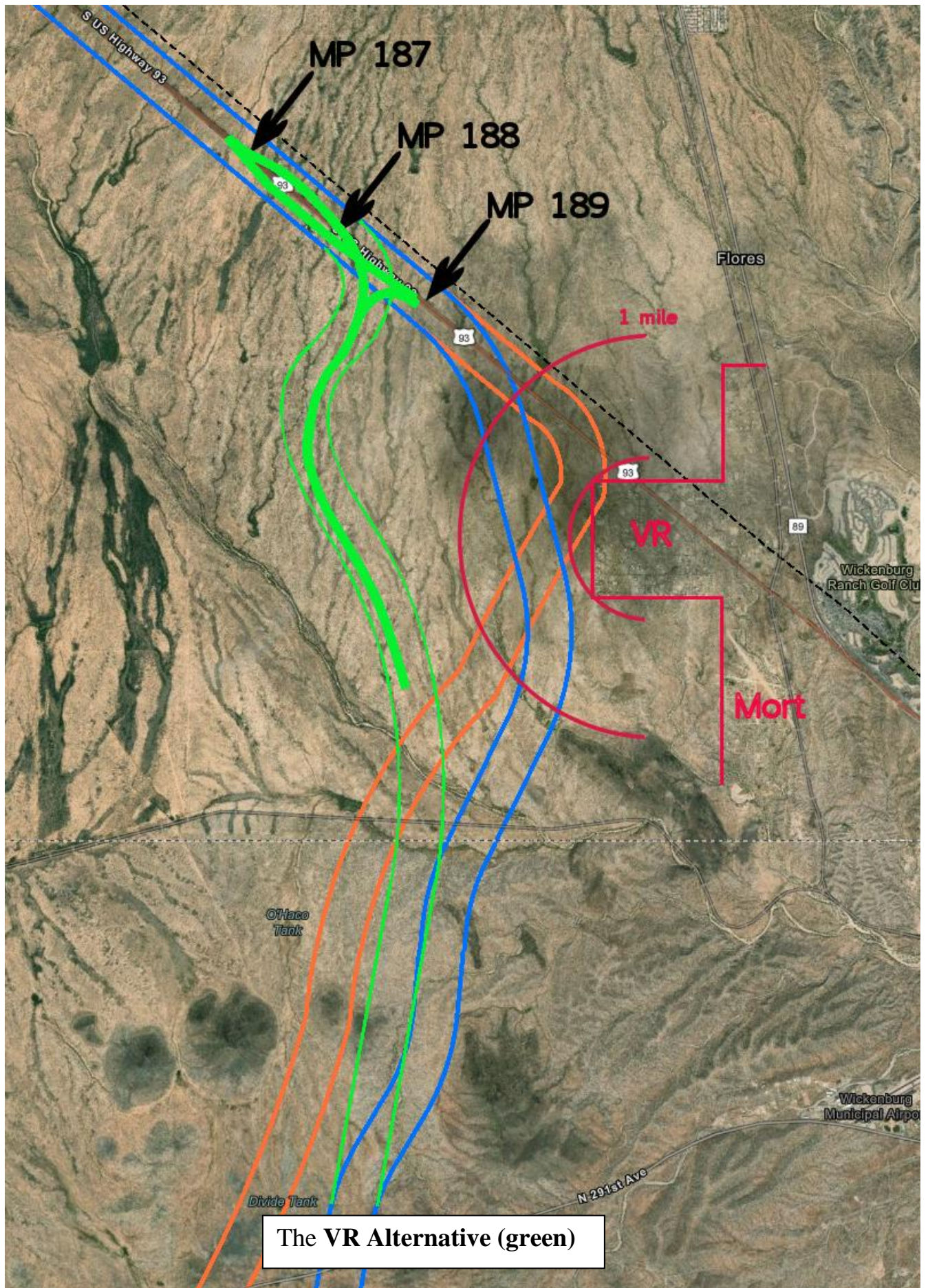
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- 3) Move I11 as far away from VR as possible.
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- 6) Provide safe access routes for people and wildlife to cross I11.
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- 8) Minimize the negative economic impact to Vista Royale.

Following is a map showing the **VR Alternative**.



The VR Alternative (green)

DISCUSSION OF THE CONSIDERATIONS FOR THE VR ALTERNATIVE:

- 1) Try to understand why the intersection of I11 and HWY93 at Mile Post 189 has been specified by almost every alternative that has been considered to date. Is there a reason that can be identified with Purpose and Need?*

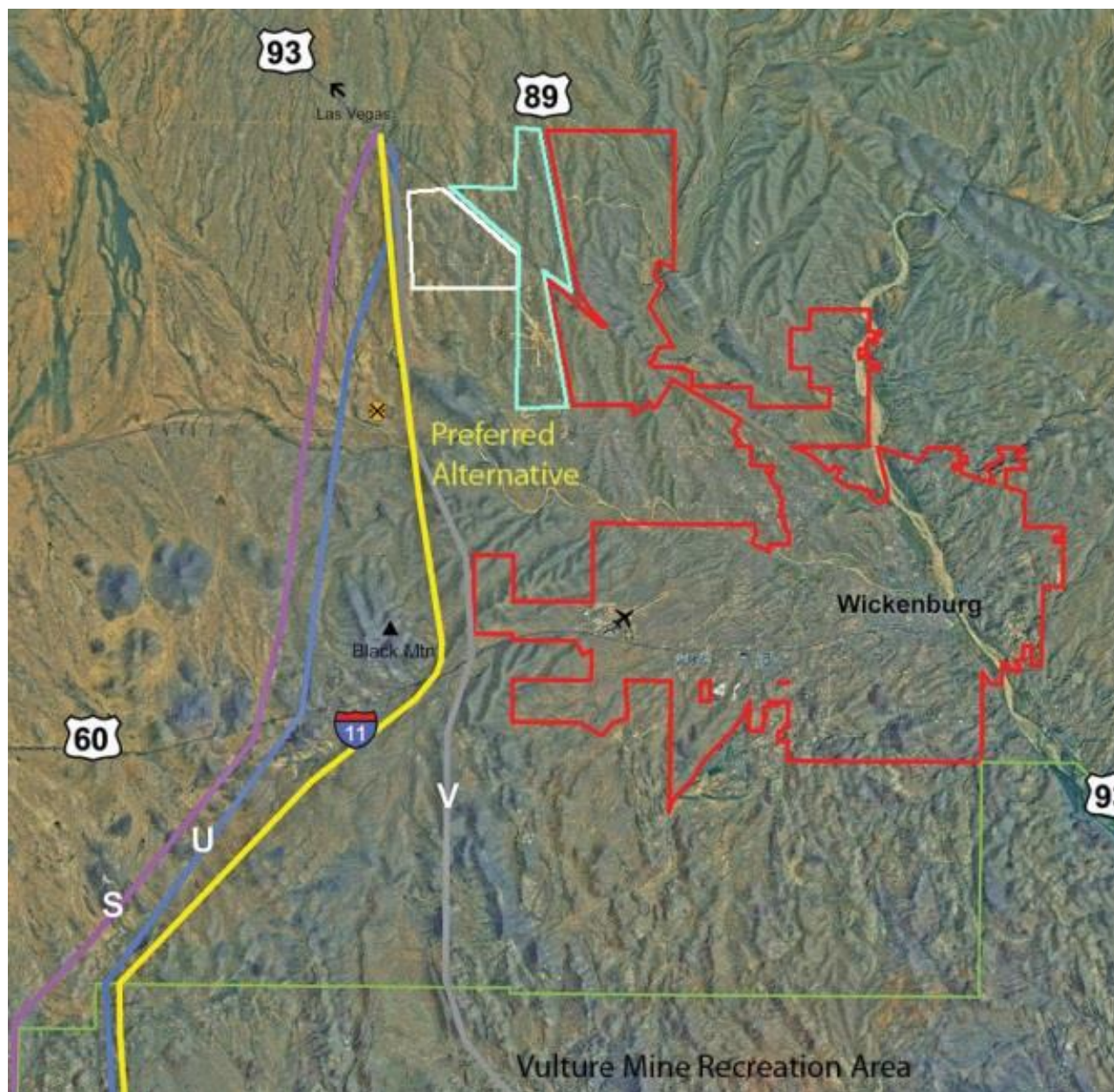
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There should be little doubt in anyone’s mind that the Project will negatively impact Vista Royale. The primary question is; does the Recommended Alternative have a local Purpose and Need that limits or prohibits change to the Recommended Alternative locally?

I understand the Purpose and Need of I11 overall. **But, I don’t see a local Purpose and Need that precludes local changes to the Recommended Alternative.** The selection of Mile Post 189 versus the selection of Mile Post 188 or 187 or any other more-westerly Mile Post obviously has no impact on the Purpose and Need of the overall project. It is conceivable though that local government, the Town of Wickenburg, might consider that connector point important to its needs.

So, it seems safe to assume that either the connector point at MP189 is non-critical or it is driven by input from the TOW. Let’s consider what we have found regarding Wickenburg’s interest at this point.

A letter from the TOW to the Maricopa Association of Governments (March 28, 2018) requests a “Preferred Alternate” route as shown on the following map:



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In the letter to the MAG, the TOW specifies that it wants to provide for the visibility from I11 of “houses, businesses, and the Municipal Airport, potentially compelling reasons to exit the interstate and visit Wickenburg”. Their map shows the “Preferred Alternative” as aligning to Corridor V in the south and then joining the termination of Corridors V, S, and U in the north. The TOW is obviously interested in minimizing the proximity of I11 to downtown Wickenburg near businesses and the airport and is not concerned about its connector point at MP189.

The fact that Corridors S, U, and V terminated at MP189 long before this particular proposal from TOW indicates that this proposal from TOW had nothing to do with the selection of MP189.

Given that the TOW proposed “Preferred Alternative” is not shown on the current Alternatives maps, it can be concluded that the TOW request has been rejected.

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We can safely conclude that the specific location of the I11 to HWY93 intersection is not a Purpose and Need issue for the I11 overall project, and that it has not been identified as such by and for the TOW.

I think we are safe to request that the MP189 point be moved.

Of course, nothing says that there will be no objection if we change the tie point away from MP189.

If we leave the connector point at or near MP189 per the VR Alternative, there is no reason for objections.

It would be advantageous to Vista Royale to move the tie point even farther West, primarily to move the interchange structure farther away.

Even though the VR Alternative is a reasonable compromise, VR would ask that I11 engineers work to optimally distance the roadway and the interchange from the VR development.

2) What is the logic for the path of the corridor as it approaches the HWY 93 intersection?

It appears that the MP189 connector point has been in existence since the beginning of the project. It was likely placed there as a starting point for future planning (i.e. HWY93 improvements, etc.). The terrain is of similar complexity within a few miles of this corridor so I don't think that is a major engineering factor. More road length means a higher cost of construction. Keeping the MP189 connector point minimizes that concern.

The most important question is: Why was the Corridor approaching MP189 positioned so close to VR? The answer is probably, it was a first cut design by Engineering. Their task is to minimize costs. The topography near VR is slightly better than the topography to the west, hence slightly cheaper to build on.

If that is the case, then we should be able to convince the Design Team that the personal and economic costs to the Vista Royale community far outweigh the implementation cost to the State.

3) Move I11 as far away from VR as possible.

Probably, the Study Team realized how close the Orange Alternative was to VR and that's why we have the Recommended Alternative. So, I think they are trying. The VR proposal gives VR a buffer of almost 1.5 miles which is a huge difference from the Preferred Alternative. If the Engineering and Finance teams would work with us we might make that a 2 mile buffer. I see no downside for the State.

4) Retain as much open area, open view, and open access as possible.

The VR Alternative pushes the open area to near max. I11 Engineering could optimize things further to our liking if we could get them to do that. That might be done given huge amounts of input from our residents.

Accessibility to areas west of I11 could possibly be had at the intersection with HWY93 with an elevated interchange structure. The same could be true at the RR and Sols Wash crossings if an underpass were provided.

Additional access between HWY93 and US60 might be more difficult to obtain. Wildlife crossings are important as well. Washes could serve as a convenient and natural path but the roadway would probably need to be elevated to accommodate OHVs, horses, etc.

It isn't our job to engineer the project but I think it is important to at least consider the effects of our request. Our request is then; **Please provide crossing points to accommodate OHV's, pedestrians, equestrians, and wildlife at several locations along the US60 to HWY93 stretch of I11.**

5) Minimize loss of tanks, washes, and resulting local wildlife and wildlife habitat.

The VR Alternative intentionally bypasses important tanks and their feeder washes. Most of the animals that visit VR are likely attracted to tanks within a couple miles of us. The tanks and washes are literally miniature riparian areas. **Five years ago we documented 124 bird species at a nearby tank during the Audubon sponsored Spring Migration Study.**

- 6) Provide safe access routes for people and wildlife across I11.

See #4. These issues may come into play during a later Study Level.

- 7) Retain the HWY93 / US60 connector trail.

The VR Alternative does that. The trail is very close to the VR Corridor at one point but Engineering could steer the roadway to the opposite side if they are aware of the trail.

- 8) Minimize negative economic impact to VR.

The impact of I11 can only be negative. Distance is the only thing that will improve the situation for VR.

See #3.

CONCLUSIONS:

There is no chance to relocate the I11 completely out of sight of VR.

The current Blue Preferred Alternative is unacceptable for many reasons to everyone in the VR community.

The **VR Alternative** is an acceptable (in my opinion) version of the I11 corridor in our area. The corridor is moved reasonably distant to Vista Royale. The State Engineers could certainly optimize the corridor location and the roadway within that corridor and possibly gain much more separation if given enough incentive (public feedback).

The terrain traversed by the **VR Alternative** is very much like that of the Blue Preferred Alternative so engineering and construction should be minimally impacted.

The **VR Alternative** connector point, MP189, is very much like the connector point of the Blue Alternative so issues regarding proximity to the Town of Wickenburg (which appear to be none anyway), are avoided.

The VR Alternative provides a reasonable compromise between the currently recommended Preferred Alternative and the wishes of every resident and land owner within a few miles of the project.

The Study Team should easily recognize what we are trying to achieve and the reasons for that. We ask that they consider tweaking the corridor and roadway to minimize the impact to Vista Royale. Basically, that means farther away is better.

The impact of I11 on Vista Royale can only be negative. Distance will improve the situation for VR. In my opinion, there is little downside to the State to meet that request.

ONE LAST REQUEST: The VR Alternative is designed with the intent to preempt ALL objections (including from the Town of Wickenburg) by leaving the connector point at MP189. I don't have all of the data that the I11 Study Team has. It may be that the connector point location is a non-issue. If that is the case, please move the point to MP188 or even better, move it to MP187. The I11 Study Team should easily recognize what we are trying to achieve and the reasons behind that. Please help us out where you can!

Thank you for your consideration of this proposal. I am offering to assist in any way.

Thanks again,

Dale Keiser

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May 21, 2019
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Prepared by:

Debra Keiser
35600 S. Antelope Creek Road
Wickenburg, AZ 85390
Tel: 928 684 1013
rte@ibab.org

Study Team,

My husband and I attended the I11 Study presentation in Wickenburg a few weeks ago. Since then we have spent a lot of our time studying the Preferred Alternative and meeting with Wickenburg officials.

The map that was displayed at the presentation shows a very detailed corridor near the Vista Royale development where we live. That Corridor sweeps toward Vista Royale with the obvious intent to be as close as possible. But WHY? That is the question we have been trying to answer.

After many hours of study and several meetings, we can find only one explanation; a **misunderstanding**.

Correspondence from the Town of Wickenburg to the I11 Study Team requests moving the I11 closer to its Town limits. **What the Town meant specifically was to locate the I11 as close as possible to its Southwest Corner.** The Town of Wickenburg has no need for the I11 to be near its Town limits at any other point, particularly at Vista Royale!

It appears that the deliberate routing of the Corridor path to Vista Royale by ADOT is a result of a somewhat vague definition by the Town of Wickenburg and a misinterpretation by ADOT. That is the only reasonable explanation that we can find.

My husband submitted a proposal a week ago, the VR Green Alternative. Since then, we have tried to find a reason for any possible objection to that proposal and we find none.

The Town of Wickenburg has discussed with us its intent to clarify its position on the location of I11. We believe that they also intend to support our request to move the Hwy93 connector point and corridor path away from Vista Royale.

If we understand the I11 Study Guidelines, we find little reason to not locate the Hwy93 connector point away from Vista Royale (far away!).

When we examine the path of I11 across Arizona we see it removing perhaps hundreds of homes and likely destroying the property values and lifestyle of many hundreds of nearby residents. Project costs are certainly in the billions of dollars.

There is no logical reason for Vista Royale to be included in those casualties.

- 1) The misinterpreted “Need” of Wickenburg has been eliminated. There is now no Study Guideline supporting the Corridor’s current location near Vista Royale.
- 2) There are Study Guidelines that support moving the Corridors away from Vista Royale.
- 3) There is very little additional cost to move the I11/Hwy93 connector point and path away from Vista Royale.

Please do the right thing. Make the simple choice to move the path of I11 as far as possible from Vista Royale. Allow these Arizonans to retain their lifestyles and do so at a miniscule cost to the I11 project. The I11 Study Team can make life better for at least these few people.

Ref: The VR Green Alternative proposal prepared and submitted by Dale Keiser May 7, 2019.

Thanks,

Debbie

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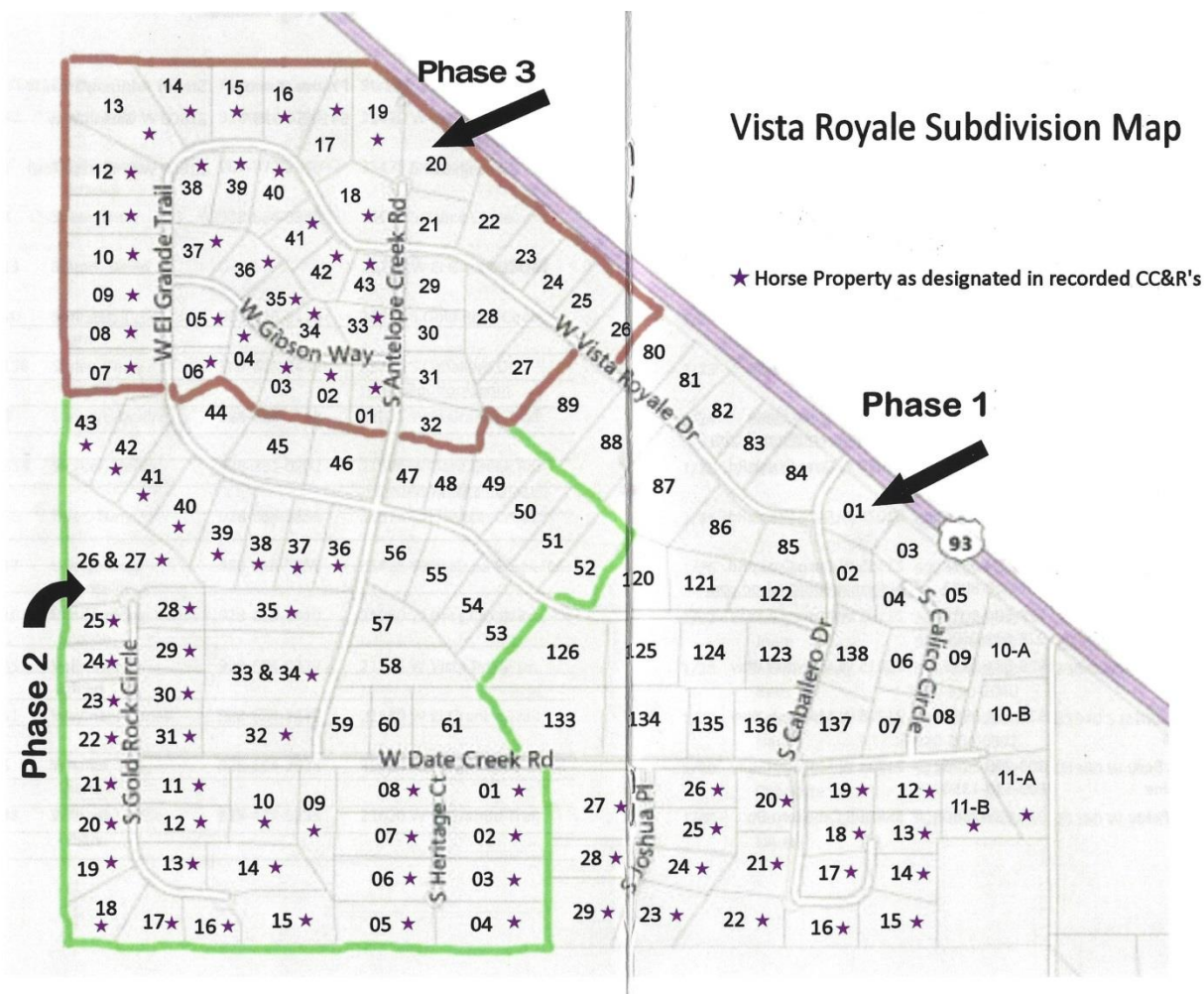
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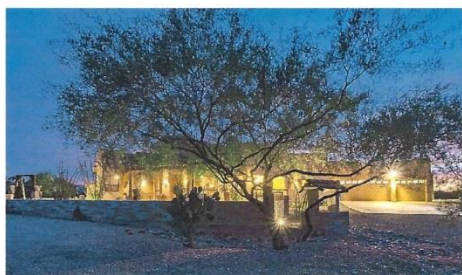


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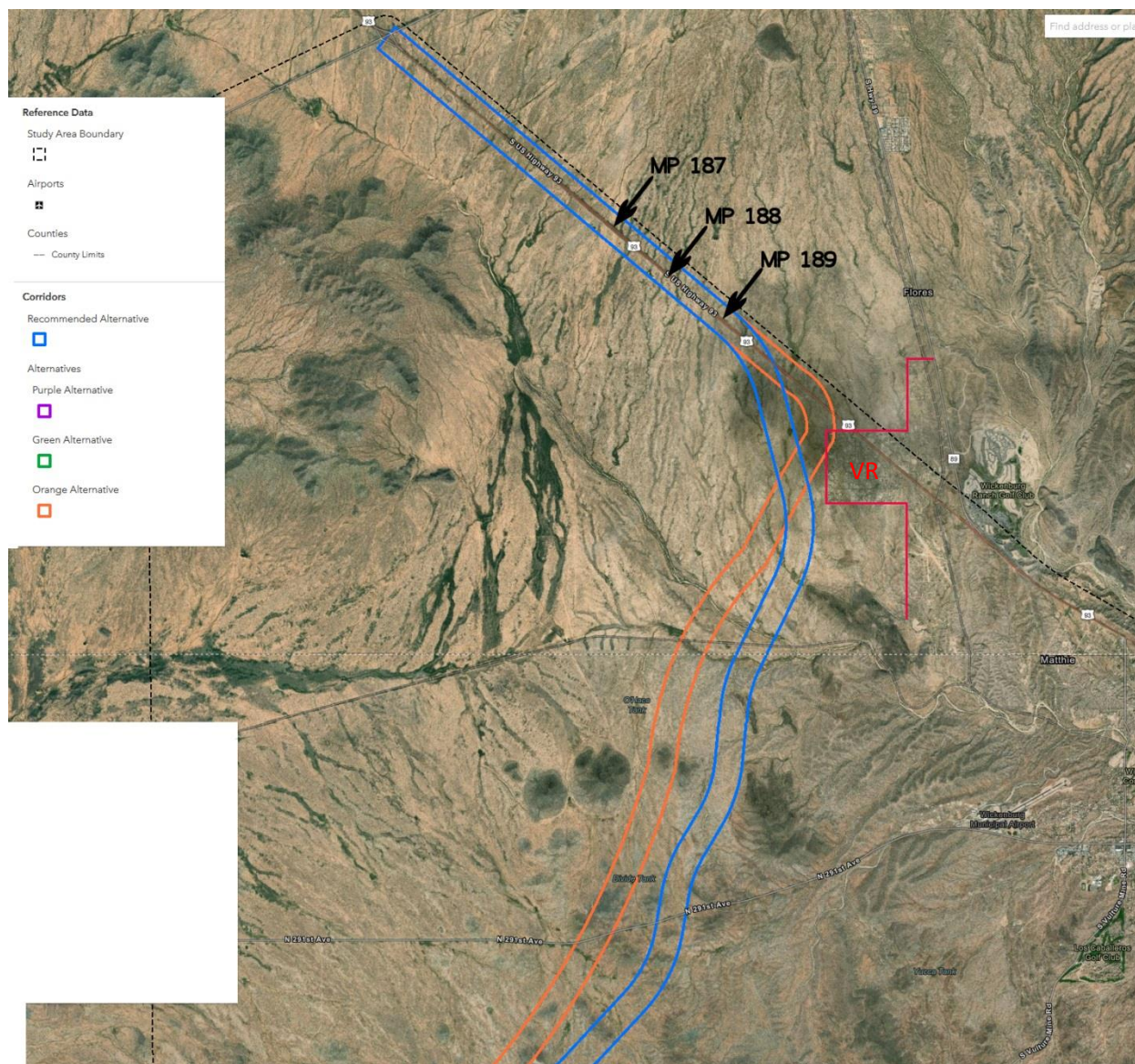
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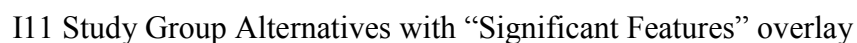


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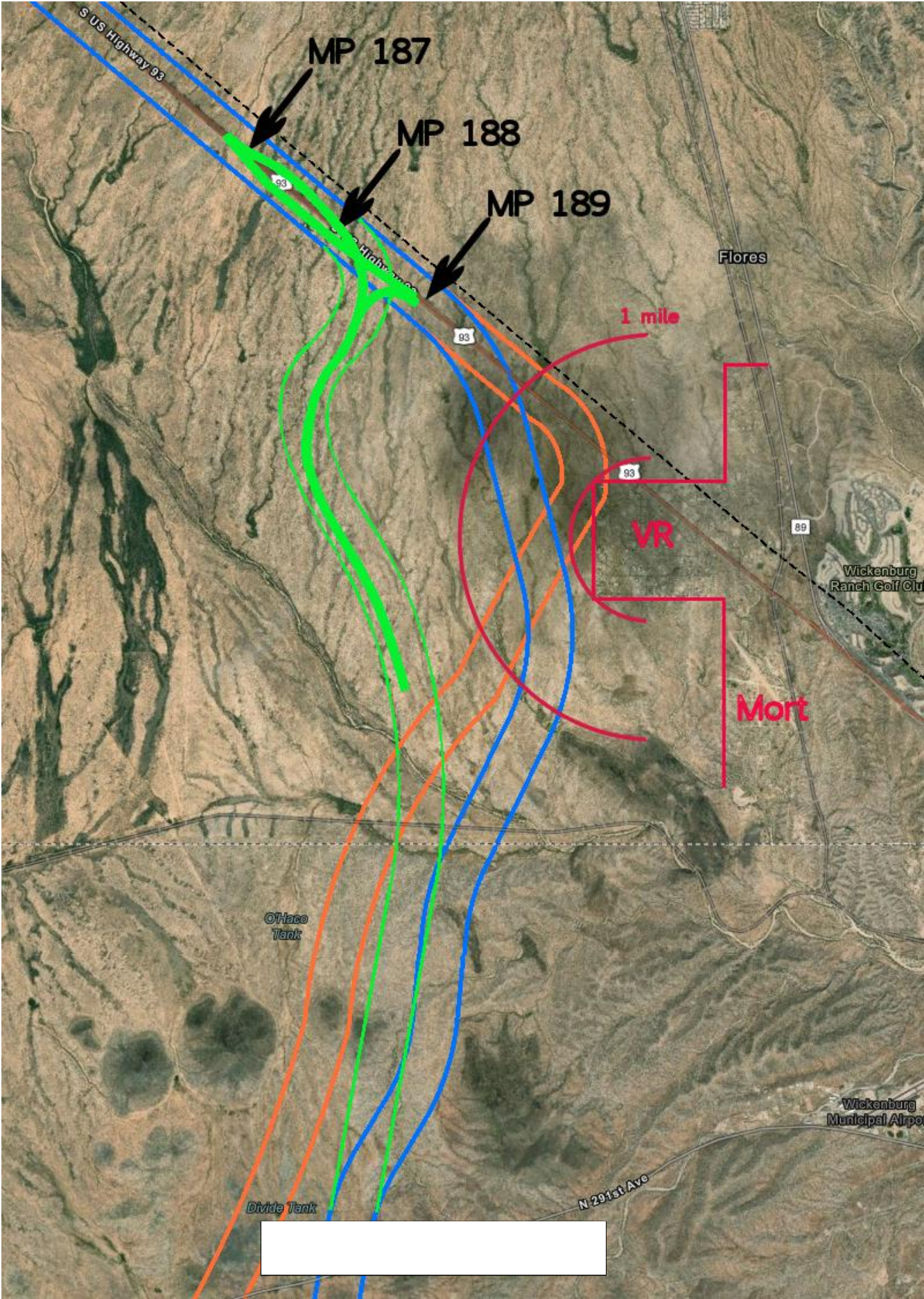
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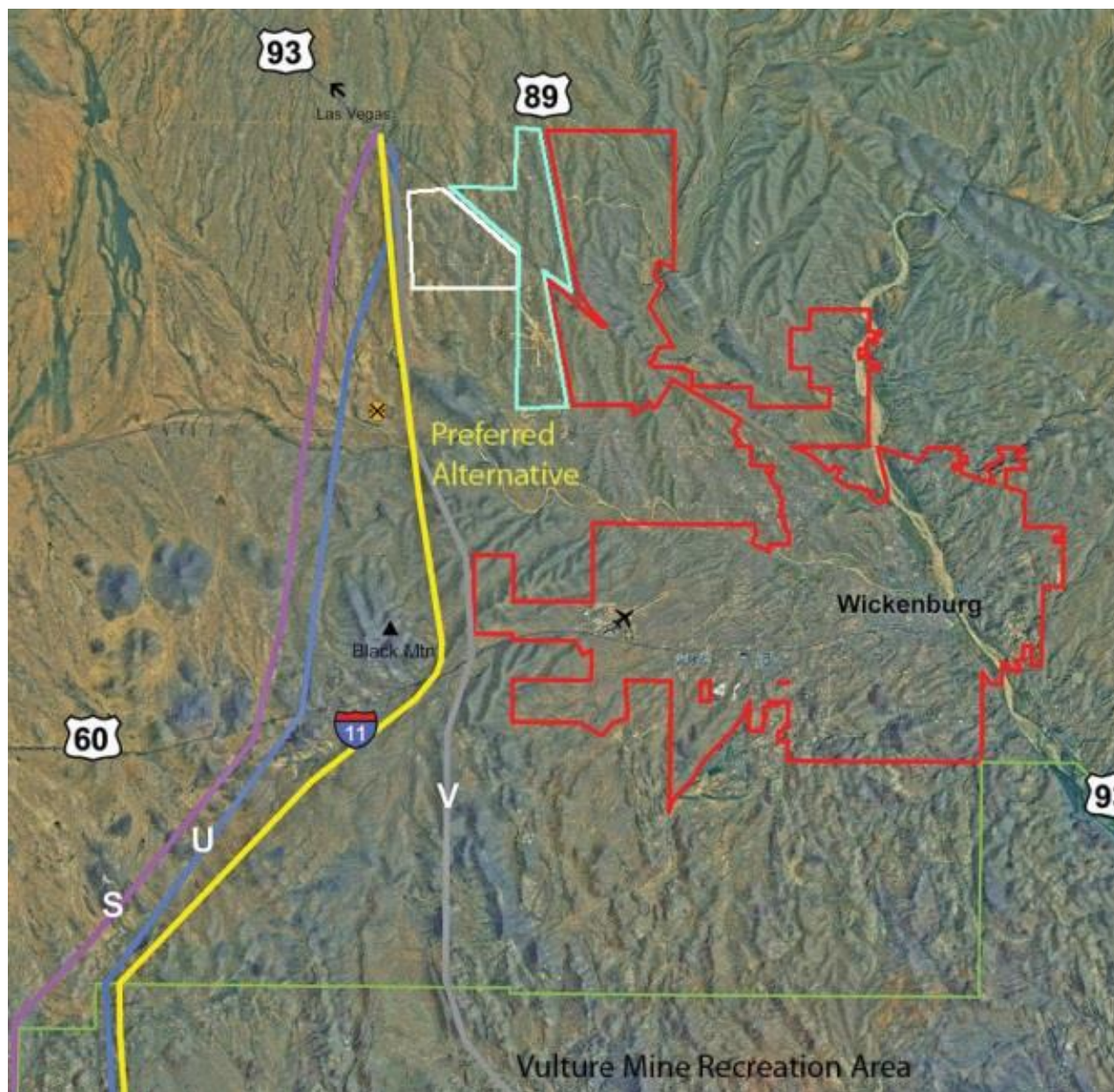
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Probably, the Study Team realized how close the Orange Alternative was to VR and that's why we have the Recommended Alternative. So, I think they are trying. The VR proposal gives VR a buffer of almost 1.5 miles which is a huge difference from the Preferred Alternative. If the Engineering and Finance teams would work with us we might make that a 2 mile buffer. I see no downside for the State.

4) Retain as much open area, open view, and open access as possible.

The VR Alternative pushes the open area to near max. I11 Engineering could optimize things further to our liking if we could get them to do that. That might be done given huge amounts of input from our residents.

Accessibility to areas west of I11 could possibly be had at the intersection with HWY93 with an elevated interchange structure. The same could be true at the RR and Sols Wash crossings if an underpass were provided.

Additional access between HWY93 and US60 might be more difficult to obtain. Wildlife crossings are important as well. Washes could serve as a convenient and natural path but the roadway would probably need to be elevated to accommodate OHVs, horses, etc.

It isn't our job to engineer the project but I think it is important to at least consider the effects of our request. Our request is then; **Please provide crossing points to accommodate OHV's, pedestrians, equestrians, and wildlife at several locations along the US60 to HWY93 stretch of I11.**

5) Minimize loss of tanks, washes, and resulting local wildlife and wildlife habitat.

The VR Alternative intentionally bypasses important tanks and their feeder washes. Most of the animals that visit VR are likely attracted to tanks within a couple miles of us. The tanks and washes are literally miniature riparian areas. **Five years ago we documented 124 bird species at a nearby tank during the Audubon sponsored Spring Migration Study.**

- 6) Provide safe access routes for people and wildlife across I11.

See #4. These issues may come into play during a later Study Level.

- 7) Retain the HWY93 / US60 connector trail.

The VR Alternative does that. The trail is very close to the VR Corridor at one point but Engineering could steer the roadway to the opposite side if they are aware of the trail.

- 8) Minimize negative economic impact to VR.

The impact of I11 can only be negative. Distance is the only thing that will improve the situation for VR.

See #3.

CONCLUSIONS:

There is no chance to relocate the I11 completely out of sight of VR.

The current Blue Preferred Alternative is unacceptable for many reasons to everyone in the VR community.

The **VR Alternative** is an acceptable (in my opinion) version of the I11 corridor in our area. The corridor is moved reasonably distant to Vista Royale. The State Engineers could certainly optimize the corridor location and the roadway within that corridor and possibly gain much more separation if given enough incentive (public feedback).

The terrain traversed by the **VR Alternative** is very much like that of the Blue Preferred Alternative so engineering and construction should be minimally impacted.

The **VR Alternative** connector point, MP189, is very much like the connector point of the Blue Alternative so issues regarding proximity to the Town of Wickenburg (which appear to be none anyway), are avoided.

The VR Alternative provides a reasonable compromise between the currently recommended Preferred Alternative and the wishes of every resident and land owner within a few miles of the project.

The Study Team should easily recognize what we are trying to achieve and the reasons for that. We ask that they consider tweaking the corridor and roadway to minimize the impact to Vista Royale. Basically, that means farther away is better.

The impact of I11 on Vista Royale can only be negative. Distance will improve the situation for VR. In my opinion, there is little downside to the State to meet that request.

ONE LAST REQUEST: The VR Alternative is designed with the intent to preempt ALL objections (including from the Town of Wickenburg) by leaving the connector point at MP189. I don't have all of the data that the I11 Study Team has. It may be that the connector point location is a non-issue. If that is the case, please move the point to MP188 or even better, move it to MP187. The I11 Study Team should easily recognize what we are trying to achieve and the reasons behind that. Please help us out where you can!

Thank you for your consideration of this proposal. I am offering to assist in any way.

Thanks again,

Dale Keiser

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

June 25, 2019

Re: Updated Comments on I11 Study in Wickenburg area

Prepared for the Vista Royale I-11 Study Team by:

Dale Keiser
35600 S. Antelope Creek Road
Wickenburg, AZ 85390
Tel: 928 684 1013
rte@ibab.org

I-11 Tier 1 EIS Study Team,

HISTORY:

I last wrote on May 7, 2019 a few days after the Tier 1 Study presentation in Wickenburg on April 30, 2019. I explained that my wife and I, as well as a number of Vista Royale residents, were shocked by the corridors that were detailed on your maps. We were told that the Tier 1 Study comment period had been extended to July 8, 2019, a few weeks away. That date placed a priority on organizing a prompt response from residents of Vista Royale and nearby communities.

My letter of May 7, 2019 was an attempt to gather some preliminary data, to generate a logical thought process, and to propose an Alternative corridor that would serve as a **starting point for discussion**.

The May 7 letter did become a starting point for discussion. A number of Vista Royale (VR) residents united to create the Vista Royale I-11 Study Team. The Team created a web site (www.ProtectOurWickenburgLifestyle.com) and a postcard mailer. Both of those media formats encouraged Wickenburg residents, residents of Vista Royale, and residents of nearby communities to contact ADOT and voice their opinions about the ADOT "Recommended Alternative". They were asked to also recommend the Vista Royale proposal which was referred to as the "VR Green Alternative". The "VR Green Alternative" is a document that not only shows a compromise corridor drawn on a map, but it is also a request that ADOT do all that it can to move the corridor as far from Vista Royale as possible.

After the “VR Green Alternative” document was completed, it was sent to the I-11 Study Team and to the Town of Wickenburg. A “Letter to the Editor” plus a detailed article in the Wickenburg Sun newspaper caught the attention of the Town Council. **They studied the data and came to the conclusion that their intent had been misunderstood by ADOT.** An emergency I-11 Task Force meeting took place resulting in a recommendation being given to the Town Council. The Wickenburg Town Council voted to pass a new Resolution that clearly represented its intent. That Resolution has been submitted to the I-11 Study Team and to ADOT.

THE NEW TOWN OF WICKENBURG RESOLUTION CLEARS A PATH TO THE FOLLOWING LOGIC:

- 1) The direction of the I-11 is dictated primarily by NEED and PURPOSE, terms described by the Study Team (EIS) Guidelines.
- 2) ADOT has been under the impression that the Town of Wickenburg has a NEED and PURPOSE for the I-11 to be near its Town Limits. The current Recommended (Blue) corridor certainly reflects that fact!
- 3) Until now, the NEED of Wickenburg has been in opposition to the NEED of Vista Royale.
- 4) The Town of Wickenburg has passed a Resolution that officially and clearly states (or at least strongly implies) that:
 - a) the Town of Wickenburg has no NEED for the I-11 corridor to be near its Town Limits.
 - b) the TOW supports the NEED of Vista Royale to have the corridor tie point at HWY 93 moved 5 miles Northwest of VR
 - c) the TOW supports moving the path of the corridor westward to return open space to VR
- 5) The NEED of the Town of Wickenburg is no longer in opposition to the NEED of Vista Royale
- 6) We find no other entity that has a NEED in opposition to the NEED of VR.
- 7) Given that VR is the only "entity" presenting a NEED to ADOT for this section of the I-11, it is a logical conclusion that ADOT should honor that NEED.

Beyond NEED and PURPOSE, ADOT consistently talks about trying to avoid solving one problem while creating another. Moving the corridor westward into open country (vacant State Trust Lands) does not create another problem!

NEEDS:

Following is a list of some of the NEEDs that have been expressed by Vista Royale residents:

- 1) **LIFESTYLE:** By now, the Study Team and ADOT should be well aware of the types of homes that are in Vista Royale and the lifestyle of their owners. All of the residents of these upscale homes have moved to Vista Royale because of its moderate isolation, the openness, the beauty, and the accessibility of the adjacent desert. Some build and invest here to escape the cities with their crowded housing and crowded streets. Others build here to escape the weather in their home states where they had already become accustomed to a life with open spaces, beauty and accessibility. A highway like I-11, within 5 miles of Vista Royale will be devastating to the lifestyle of all of these residents.
- 2) **ECONOMIC HARDSHIP:** For the same reasons just listed, people seeking the current Vista Royale dream will no longer consider buying or building in Vista Royale when a highway blocks the view and closes access to the open land to the west. The recent appearance of a detailed corridor, just a line-on-a-map, has crossed the threshold where buyers will no longer accept the risk of a super highway in their backyard. Property values are quickly declining. That fact holds no matter how many years away actual I-11 construction might be.
- 3) **DISTANCE:** The only things that the I-11 can offer Vista Royale are things that are bad. Vista Royale NEEDS distance; distance from bright lights that ruin the dark sky, distance from the noise of constant traffic that ruins the peaceful atmosphere, distance from the structures and fences that block access to the open desert, distance from a multi-level interchange that would block out the mountain views, and distance from all the things that VR residents thought they had escaped when they left the cities and moved to Vista Royale.

WHAT HAVE WE MISSED?

At this point, we think we have provided very logical and convincing reasons for moving the I-11 corridor 5 miles away from Vista Royale. But, we need to ask, have we considered everything?

Politics:

We have no way of knowing what politics are hidden out of our view. It is curious to think about why Highway 93 has been upgraded to I-11 standards out to the exact location that the corridors under study are slated to attach. Has a tie point decision already been made without the public input required by the study? That and a dozen other “conspiracy theories” have been brought to our attention but are things that we are unable to address. We trust that the EIS Study will be fair to the Needs of the citizens and not to the needs of the politicians.

Unofficial data:

VR has participated in discussions with Wickenburg that are pertinent to the Needs of VR but were not officially relayed by Wickenburg to ADOT.

The Wickenburg Resolution implies that Wickenburg has no need for the I-11 to be near its northwest Town Limits. It doesn't specifically make that statement. It also does not specifically make the statement that moving the I-11 tie point will benefit Wickenburg. Wickenburg has talked about that benefit. The benefit is based on the fact that Wickenburg cannot afford to annex Vista Royale (hence part of the reason that the Town never intended for the I-11 to be close to VR). And, it cannot afford to annex beyond Vista Royale. However, Wickenburg has said that commercial interest at MP186 could be attractive to, and financially supported by, Yavapai County. Development near MP186 and between Wickenburg and MP186 would mean more business for Wickenburg at no cost to Wickenburg.

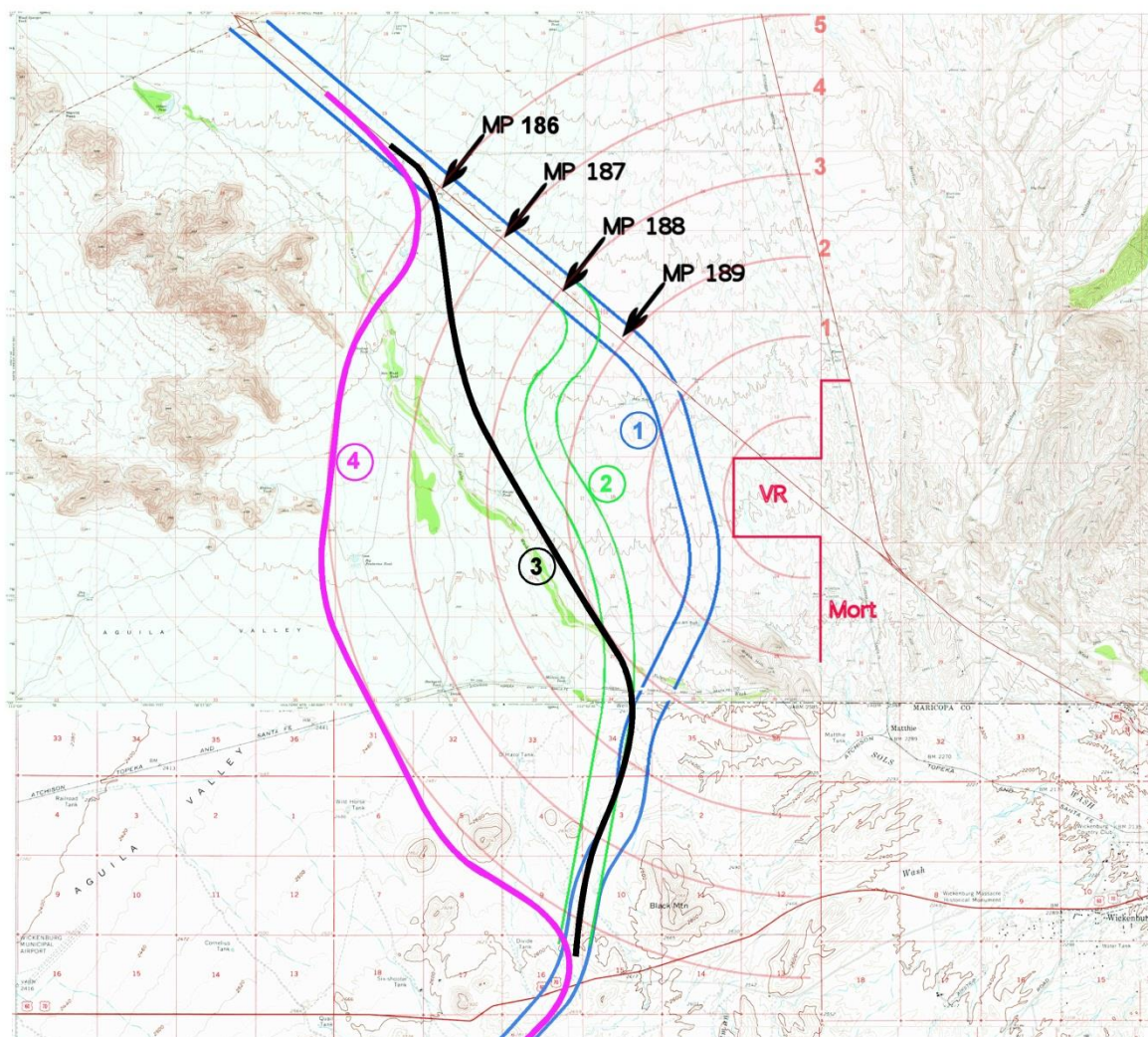
Following that line of reasoning, it can be said that more development within VR would also mean more business for Wickenburg at no cost to Wickenburg. Conversely, the location of I-11 to a point near VR would stop construction on the 50+ vacant lots in VR and that potential business for Wickenburg would be negated.

Engineering / Eliminated Options:

There have been dozens of calls to move the corridors back to an Eliminated Option. We realize that this is not likely an option at this point, although that might satisfy the NEEDS of VR. There have been discussions that the mistaken NEED of Wickenburg to have the I-11 corridor near its northwest Town Limits may have been a deciding consideration in the elimination of other corridors. If so, perhaps it is logical to revisit those corridors.

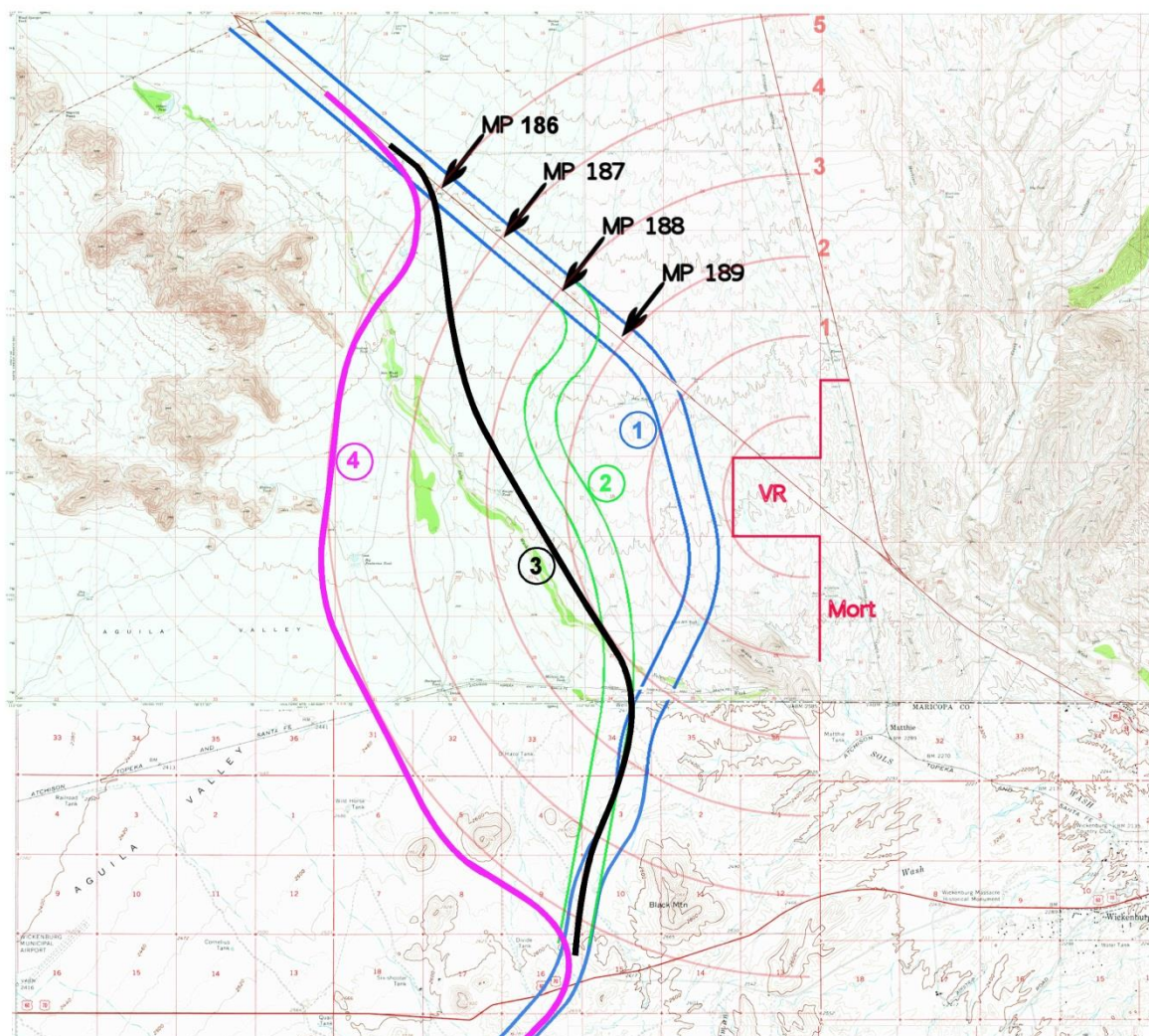
There has been considerable input regarding specifically how and why the corridor should weave through the terrain west of VR. We recognize that these points are an ADOT Engineering responsibility and we recognize that input of this type will likely do little to support our plea.

THE EVOLUTION OF THE VISTA ROYALE PROPOSED CORRIDOR



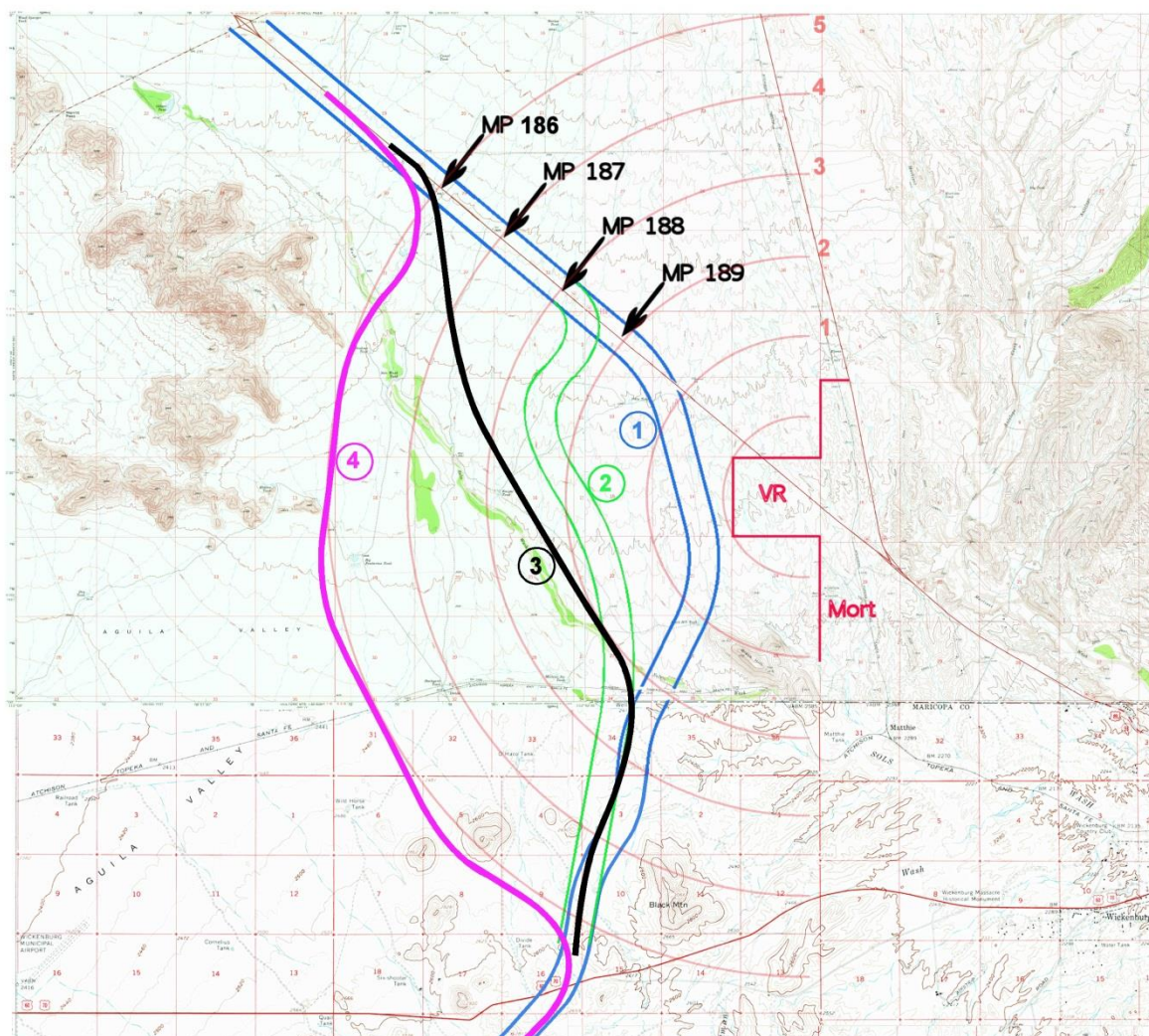
- ① Corridor 1: The original ADOT “Recommended Alternative”

Map 1: April 30, 2019: ADOT designs a corridor with the belief that the Town of Wickenburg needs the I-11 corridor to be as close as possible to the Wickenburg Town Limits.



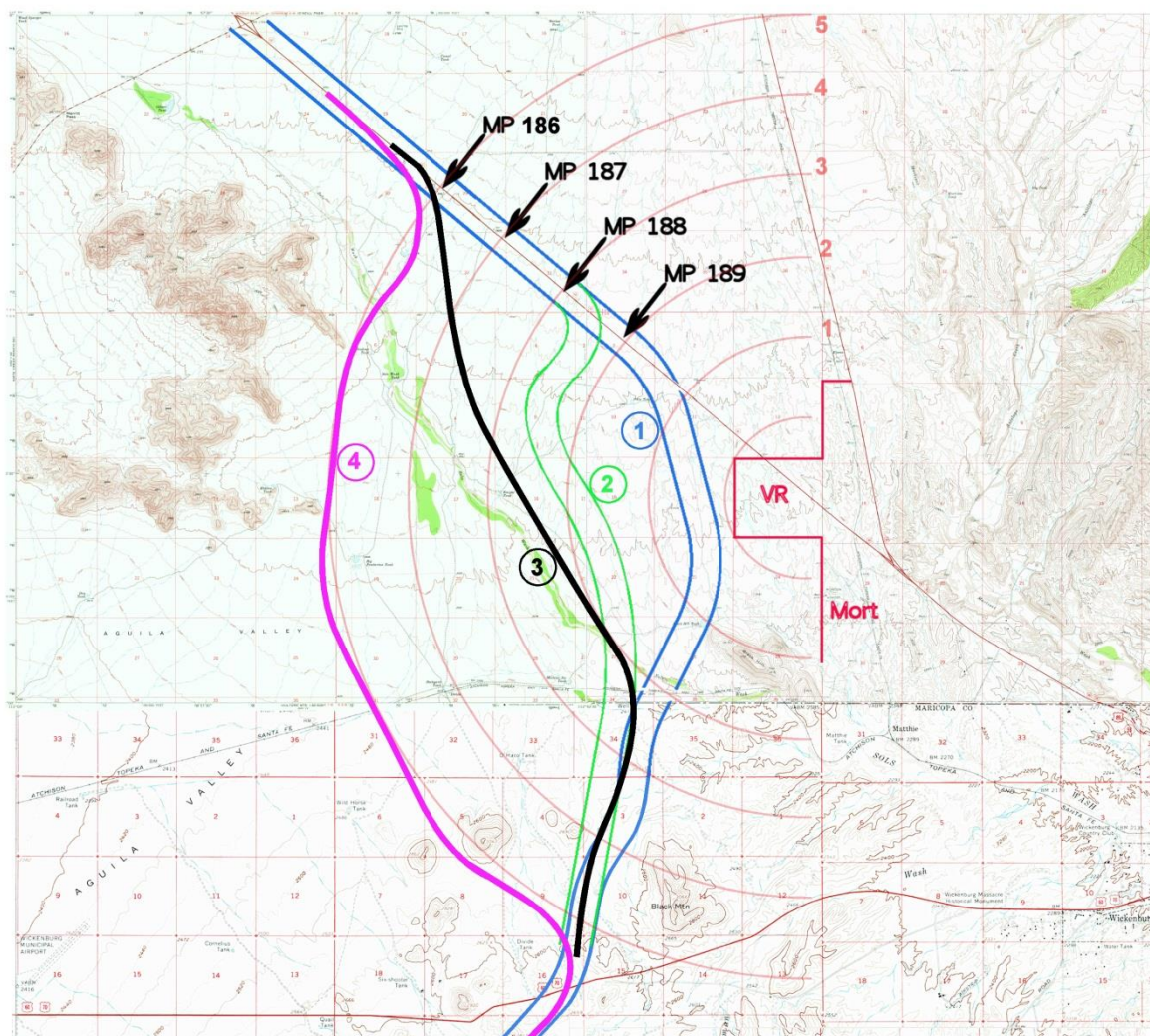
② Corridor 2: “The VR Green Alternative”

Map 2: May 7, 2019: Vista Royale presents a compromise corridor (VR Green Alternative) to ADOT assuming that the connector point at Highway 93 was permanently fixed. This was our starting point on a plan to revise the ADOT corridor.



③ Roadway 3: Town of Wickenburg “Proposed Roadway”

Map 3: June 17, 2019: In response to the outcry from Vista Royale residents and friends, the Town of Wickenburg passes a Resolution indicating that it DOES NOT need the I-11 corridor to be near its northwest Town Limits. The Town supports moving the tie point to Mile Post 186 and it supports moving the corridor path more westerly.



- ④ Roadway 4: This roadway is the currently preferred request to ADOT by Vista Royale. The preferred roadway is called “VR2”

Map 4: June 25, 2019; Vista Royale agrees with the Town of Wickenburg’s Resolution to move the Highway 93 connector point to Mile post 186. Vista Royale requests that the path of the corridor be moved a distance to the west in addition to that proposed by the TOW. This will meet the Need and Purpose of Vista Royale, and is the Preferred Solution!

THE RIGHT THING TO DO:

The overall I-11 project is no doubt good for our country. The cost to certain individual citizens will be high.

The EIS online map of the I-11 presents a very scary overview. The I-11 highway creates a path of unavoidable destruction, hardship, and anguish for probably many hundreds of people.

That doesn't have to be the case for Vista Royale. The Vista Royale case presents an opportunity to easily resolve one conflict without creating another!

Instead of degrading the lives of a hundred people, make a hundred people happy! Simply move the I-11 corridor to the open desert 5 miles away.

Thank you,

The Vista Royale I-11 Study Team

With the support of:

Every concerned citizen who has written, emailed, or called the I-11 Tier 1 EIS Study Team or ADOT expressing opposition to the location of I-11 near Vista Royale.

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

May 7, 2019
Re: Comments on I11 study in Wickenburg area

Prepared by:

Dale Keiser
35600 S. Antelope Creek Road
Wickenburg, AZ 85390
Tel: 928 684 1013
rte@ibab.org

Study Team,

My wife Debbie and I attended your recent presentation in Wickenburg for the Tier 1 Study. It is safe to say that at first, we were shocked by the corridors we saw on your maps. But, after talking with several members of your team, we felt confident in the processes that you follow. We think we still have a good opportunity to make changes to the current Recommended Alternative.

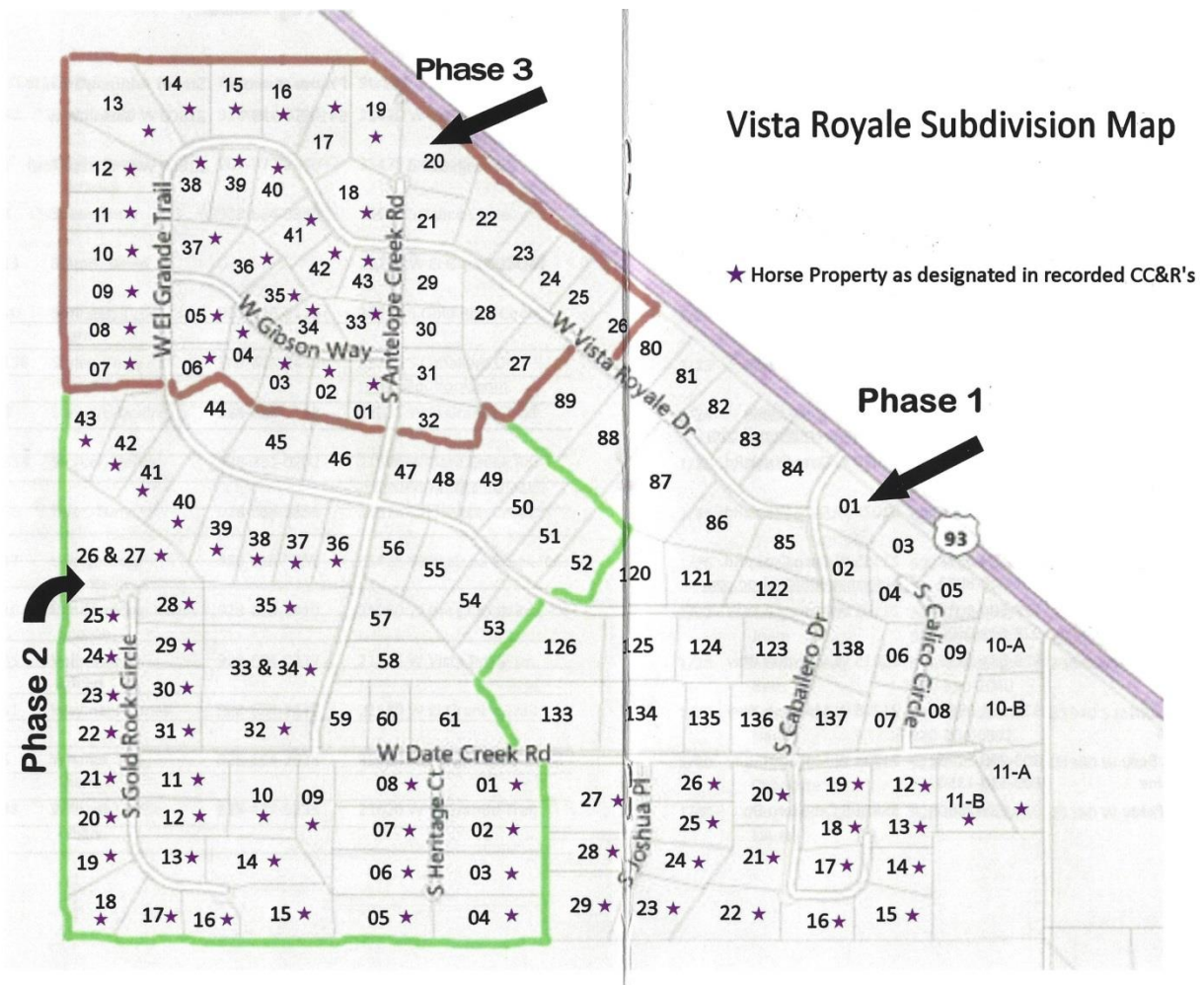
I would like to tell you about our community and some of the things that are important to us that you may not be aware of. Then I would like to explain how the Recommended Alternative is in conflict with these important things. Then, rather than just complain, I will offer a modified Alternative (VR Alternative) along with an explanation of how the VR Alternative might meet your requirements as well as our interests.

VISTA ROYALE: My impression is that your team may not be familiar with our neighborhood, Vista Royale. That familiarity is key to understanding the lifestyle and wishes of the neighborhood.

See the following map of our subdivision. The subdivision is made up of 156 lots with lot sizes ranging from 2 acres to 5 acres. There are currently just over 100 homes. You can view the area from your satellite imagery and see most of the lots and the developed areas. Note that some of the lots have been combined by owners to give more space around their homes. Be aware also that some of the lots adjacent to developed properties are owned by the owner of the developed property and serve as even more “buffer” space. The Subdivision Map has an asterisk placed in the lots that are recorded as Horse Properties and were purchased at premium prices. Notice that these properties are to the west and south of the development nearest the open State Trust Land.

For many (probably all) of us, open space is a commodity that is very valuable. Also note from the imagery the size of the homes and outbuildings plus the extensive horse facilities.

Something that you don't see in the satellite imagery or the Subdivision Map is the number of homeowners who are avid outdoorsmen; hikers, bicyclists, and OHV operators who frequent the desert to the south and west of VR. This plus the open space is the reason that we live here.

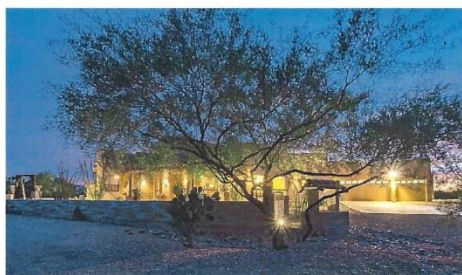


To help make these points, please see the following sales brochure that I just picked up from a nearby home bordering the State Trust land. (I deleted realtor info.)

\$870,000.

35650 Gold Rock Circle

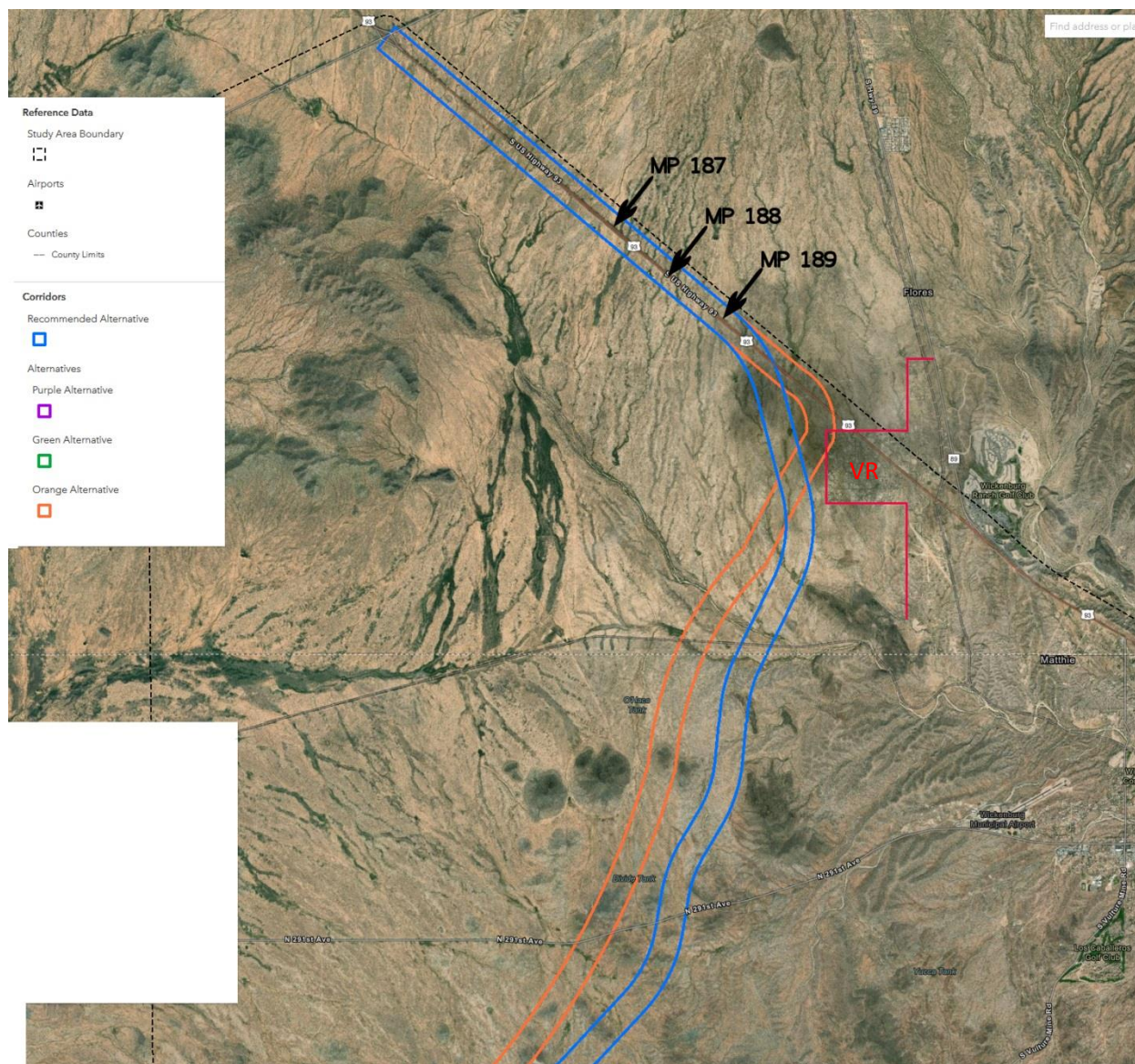
Master Suite + 3Br An Elegant 3,326



A RARE BEAUTY! Live the way you always dreamed it to be in in this Territorial 4Bedroom with 3Bath. Huge Kiva Poles Adorn Entrance and Open Living Nestled on Nearly 3 acres. Dining surrounded by Windows of Stunning Views. Enjoy the Luxury of the Master Bedroom Suite. All opening to Covered Patios Leading to Private Courtyards. A Masterful Gourmet Kitchen has More Views to Enjoy. A 3,326 SF Home with 3-4 Car Garage. Take Path to Detached Dual His/Her Shops, with AC! One is Plumbed for Easy Convert to the Guest House. His Shop Sports another 3car Gar. Complete with Elaborate Bath and Instant Hot Water. Venture on to the Tack Room and Hay Storage and Out to the Dual Mare Motel, Pipe Fenced Turnouts. Your Horses will Love the Gate to the Bordering State Land for Great Riding or Hiking! Land-scaped with Mature trees and Plantings. MLS 5796554 NOW REDUCED !

This brochure does a pretty good job of defining the “feel” of Vista Royale. And, this offering is typical of all of the homes in VR.

Notice the view from the huge windows and the price of the property. What would that view be and what would the price be if the “Gate to the Bordering State Land” led to I11 a few hundred feet away?



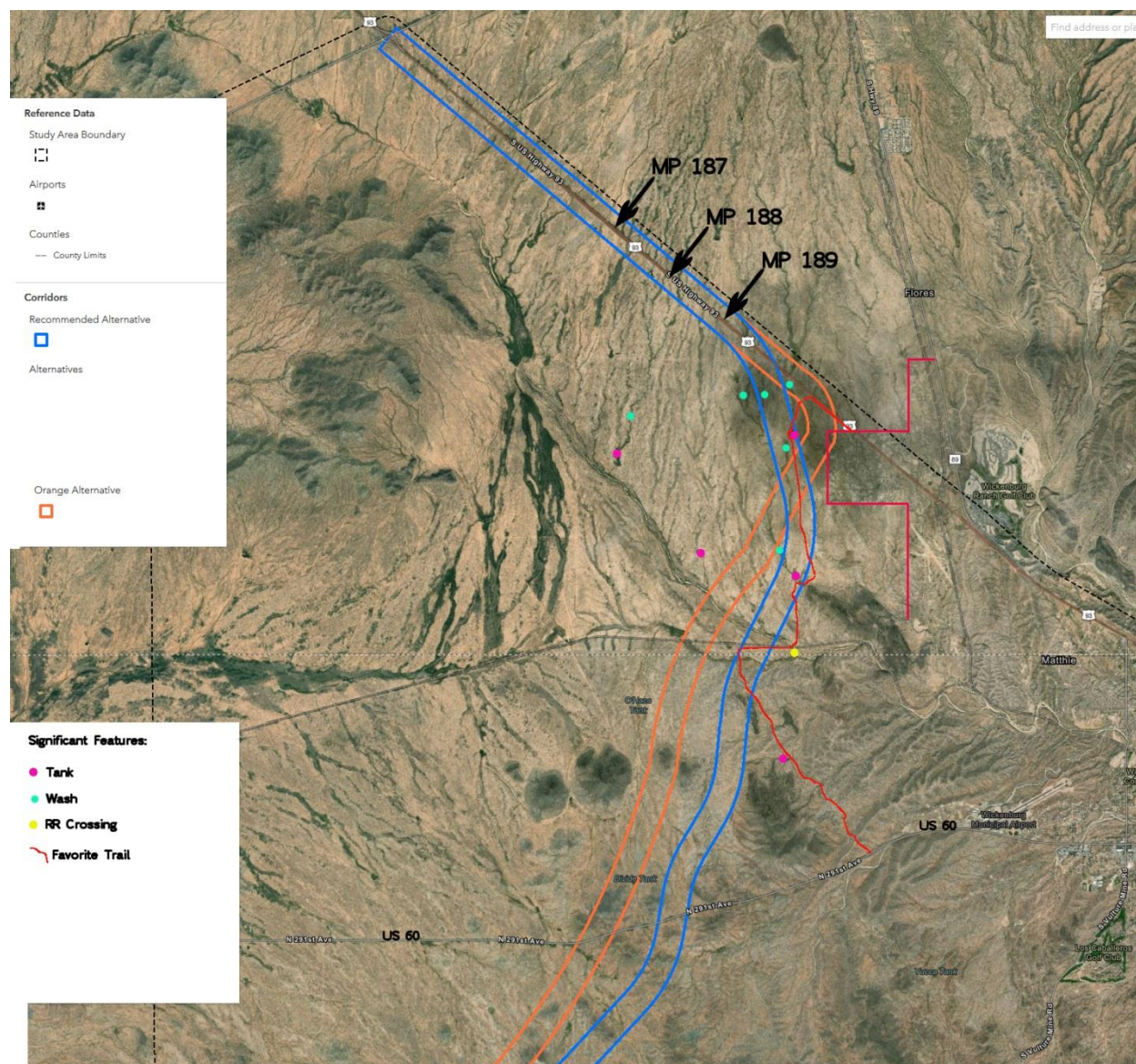
I11 Alternative Corridors. Mile Posts and Vista Royale outline added by the author.

THINGS FOR THE STUDY TEAM TO CONSIDER:

When the residents of Vista Royale look to the West and to the South, they see wide open spaces. They have purchased land here and they have built their dream homes here because of that openness, the scenic beauty, and its easy access.

The proximity of the Alternate routes provides a “wall” to the West as well as blocking trails for access to the South. If I11 is completed as it is currently defined, most if not all of the features that make VR special will be lost. Property values will certainly plummet. This is not an emotional reaction, it is fact.

The following map shows tanks and feeder washes that are important to the abundant local wildlife. The map also shows a trail that connects HWY93 to US60. This trail is used extensively by VR residents for its beauty, its challenge to OHV operators, its access to the TOW, and access to the whole Vulture Mountain area including the soon-to-be Recreation Park.



I11 Study Group Alternatives with “Significant Features” overlay

The only trail connecting HWY93 to US60 is shown on the above map’s legend as “Favorite Trail”. This connectivity exists now because of an old mining road, a ranch road, and a single

gated crossing under the railroad at the point designated by the yellow dot. That trail is destroyed by the current Recommended Alternative.

Note the number of Tanks near and within the Recommended Alternative corridor. These tanks are vital to the diverse and abundant wildlife in the area (another Vista Royale perk). The closeness of I11 will adversely impact that wildlife. I can't speak for the hunters, but I know that these tanks see a lot of action during bird seasons and we often see Javalina and deer watering there.

Tanks are located where they are because of the concentrated runoff of rainwater. With increased runoff comes increased erosion and deeper washes. Those deeper washes are noted on the map. Deeper washes increase construction complexity. They also provide better wildlife habitat.

CONSIDERATIONS FOR DEVELOPING THE VR ALTERNATIVE:

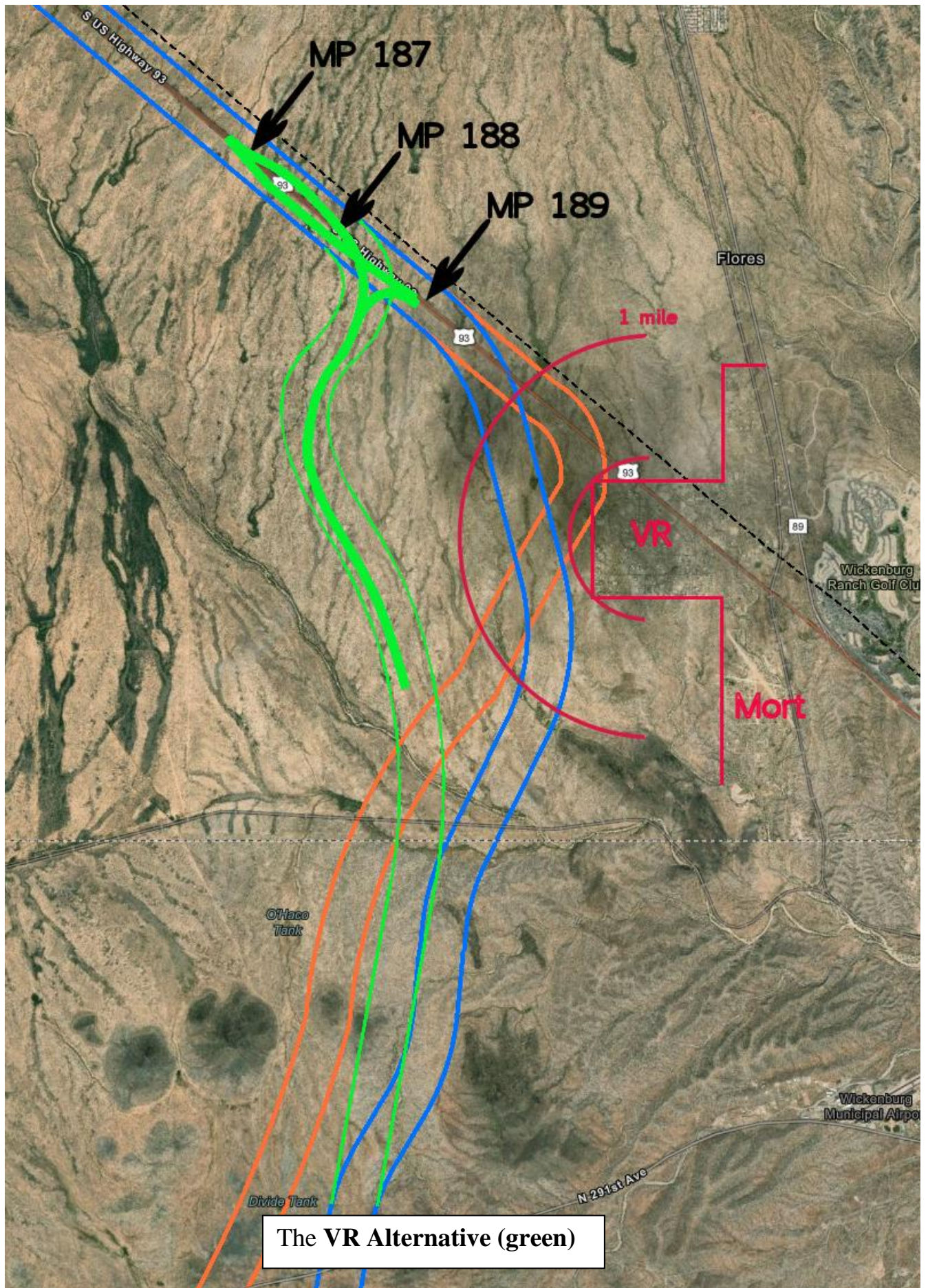
Regarding Public Interest:

- 1) Try to understand why the intersection of I11 and HWY93 at Mile Post 189 has been specified by almost every alternative that has been considered to date. Is there a reason that can be identified with Purpose and Need?
- 2) What is the logic for the path of the corridor as it approaches the HWY 93 intersection?

Regarding Vista Royale Interest:

- 3) Move I11 as far away from VR as possible.
- 4) Retain as much open area, open view, and open access as possible.
- 5) Minimize loss of tanks, washes, and local wildlife
- 6) Provide safe access routes for people and wildlife to cross I11.
- 7) Retain the HWY93 / US60 connector trail.
- 8) Minimize the negative economic impact to Vista Royale.

Following is a map showing the **VR Alternative**.



The VR Alternative (green)

DISCUSSION OF THE CONSIDERATIONS FOR THE VR ALTERNATIVE:

- 1) Try to understand why the intersection of I11 and HWY93 at Mile Post 189 has been specified by almost every alternative that has been considered to date. Is there a reason that can be identified with Purpose and Need?*

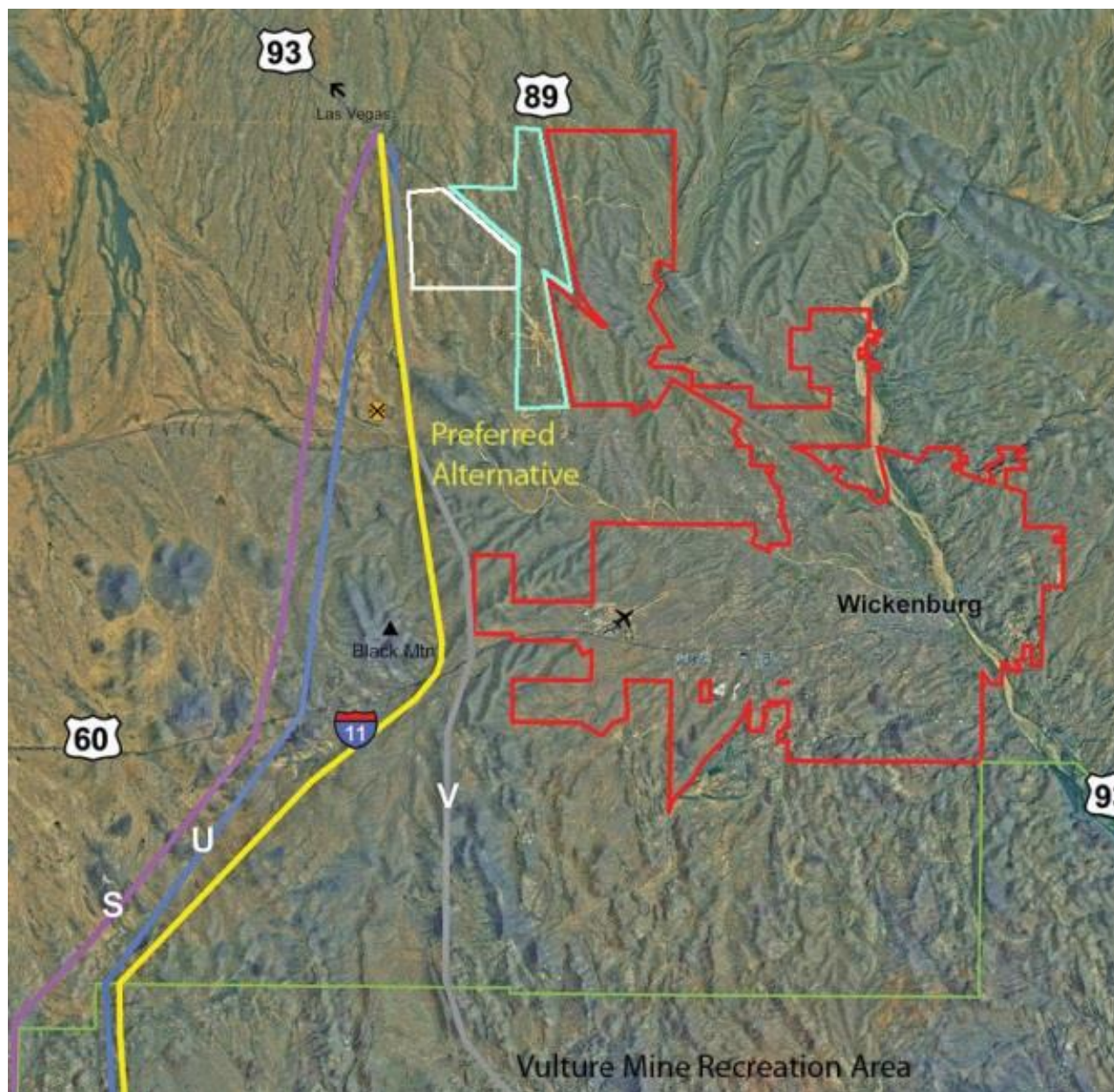
The I11 Study Process defines and emphasizes the importance of **Purpose and Need**. After that, a technical analysis is tasked with, among many other things, “minimizing potential to impact existing development”.

There should be little doubt in anyone’s mind that the Project will negatively impact Vista Royale. The primary question is; does the Recommended Alternative have a local Purpose and Need that limits or prohibits change to the Recommended Alternative locally?

I understand the Purpose and Need of I11 overall. **But, I don’t see a local Purpose and Need that precludes local changes to the Recommended Alternative.** The selection of Mile Post 189 versus the selection of Mile Post 188 or 187 or any other more-westerly Mile Post obviously has no impact on the Purpose and Need of the overall project. It is conceivable though that local government, the Town of Wickenburg, might consider that connector point important to its needs.

So, it seems safe to assume that either the connector point at MP189 is non-critical or it is driven by input from the TOW. Let’s consider what we have found regarding Wickenburg’s interest at this point.

A letter from the TOW to the Maricopa Association of Governments (March 28, 2018) requests a “Preferred Alternate” route as shown on the following map:



Town of Wickenburg submitted “Preferred Alternate” route

In the letter to the MAG, the TOW specifies that it wants to provide for the visibility from I11 of “houses, businesses, and the Municipal Airport, potentially compelling reasons to exit the interstate and visit Wickenburg”. Their map shows the “Preferred Alternative” as aligning to Corridor V in the south and then joining the termination of Corridors V, S, and U in the north. The TOW is obviously interested in minimizing the proximity of I11 to downtown Wickenburg near businesses and the airport and is not concerned about its connector point at MP189.

The fact that Corridors S, U, and V terminated at MP189 long before this particular proposal from TOW indicates that this proposal from TOW had nothing to do with the selection of MP189.

Given that the TOW proposed “Preferred Alternative” is not shown on the current Alternatives maps, it can be concluded that the TOW request has been rejected.

I briefly viewed a document at the Wickenburg I11 meeting that referenced TOW Resolution 2043 and one sentence reference a connector point at “MP189”. I understood that to specify the same point as all other Alternatives rather than a specific request for the connector point to be set at MP189. I am unable to find that document on the I11 Study site. I find a date entry of May 1, 2017 in Wickenburg public records for Resolution 2043. I find an earlier I11 study document that shows I11 connecting to HWY93 at MP189. That would indicate that MP189 was chosen long ago and again, that the TOW had nothing to do with it.

We can safely conclude that the specific location of the I11 to HWY93 intersection is not a Purpose and Need issue for the I11 overall project, and that it has not been identified as such by and for the TOW.

I think we are safe to request that the MP189 point be moved.

Of course, nothing says that there will be no objection if we change the tie point away from MP189.

If we leave the connector point at or near MP189 per the VR Alternative, there is no reason for objections.

It would be advantageous to Vista Royale to move the tie point even farther West, primarily to move the interchange structure farther away.

Even though the VR Alternative is a reasonable compromise, VR would ask that I11 engineers work to optimally distance the roadway and the interchange from the VR development.

2) What is the logic for the path of the corridor as it approaches the HWY 93 intersection?

It appears that the MP189 connector point has been in existence since the beginning of the project. It was likely placed there as a starting point for future planning (i.e. HWY93 improvements, etc.). The terrain is of similar complexity within a few miles of this corridor so I don't think that is a major engineering factor. More road length means a higher cost of construction. Keeping the MP189 connector point minimizes that concern.

The most important question is: Why was the Corridor approaching MP189 positioned so close to VR? The answer is probably, it was a first cut design by Engineering. Their task is to minimize costs. The topography near VR is slightly better than the topography to the west, hence slightly cheaper to build on.

If that is the case, then we should be able to convince the Design Team that the personal and economic costs to the Vista Royale community far outweigh the implementation cost to the State.

3) Move I11 as far away from VR as possible.

Probably, the Study Team realized how close the Orange Alternative was to VR and that's why we have the Recommended Alternative. So, I think they are trying. The VR proposal gives VR a buffer of almost 1.5 miles which is a huge difference from the Preferred Alternative. If the Engineering and Finance teams would work with us we might make that a 2 mile buffer. I see no downside for the State.

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The VR Alternative intentionally bypasses important tanks and their feeder washes. Most of the animals that visit VR are likely attracted to tanks within a couple miles of us. The tanks and washes are literally miniature riparian areas. **Five years ago we documented 124 bird species at a nearby tank during the Audubon sponsored Spring Migration Study.**

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See #4. These issues may come into play during a later Study Level.

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The impact of I11 can only be negative. Distance is the only thing that will improve the situation for VR.

See #3.

CONCLUSIONS:

There is no chance to relocate the I11 completely out of sight of VR.

The current Blue Preferred Alternative is unacceptable for many reasons to everyone in the VR community.

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The Study Team should easily recognize what we are trying to achieve and the reasons for that. We ask that they consider tweaking the corridor and roadway to minimize the impact to Vista Royale. Basically, that means farther away is better.

The impact of I11 on Vista Royale can only be negative. Distance will improve the situation for VR. In my opinion, there is little downside to the State to meet that request.

ONE LAST REQUEST: The VR Alternative is designed with the intent to preempt ALL objections (including from the Town of Wickenburg) by leaving the connector point at MP189. I don't have all of the data that the I11 Study Team has. It may be that the connector point location is a non-issue. If that is the case, please move the point to MP188 or even better, move it to MP187. The I11 Study Team should easily recognize what we are trying to achieve and the reasons behind that. Please help us out where you can!

Thank you for your consideration of this proposal. I am offering to assist in any way.

Thanks again,

Dale Keiser

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

June 25, 2019

Re: Updated Comments on I11 Study in Wickenburg area

Prepared for the Vista Royale I-11 Study Team by:

Dale Keiser
35600 S. Antelope Creek Road
Wickenburg, AZ 85390
Tel: 928 684 1013
rte@ibab.org

I-11 Tier 1 EIS Study Team,

HISTORY:

I last wrote on May 7, 2019 a few days after the Tier 1 Study presentation in Wickenburg on April 30, 2019. I explained that my wife and I, as well as a number of Vista Royale residents, were shocked by the corridors that were detailed on your maps. We were told that the Tier 1 Study comment period had been extended to July 8, 2019, a few weeks away. That date placed a priority on organizing a prompt response from residents of Vista Royale and nearby communities.

My letter of May 7, 2019 was an attempt to gather some preliminary data, to generate a logical thought process, and to propose an Alternative corridor that would serve as a **starting point for discussion**.

The May 7 letter did become a starting point for discussion. A number of Vista Royale (VR) residents united to create the Vista Royale I-11 Study Team. The Team created a web site (www.ProtectOurWickenburgLifestyle.com) and a postcard mailer. Both of those media formats encouraged Wickenburg residents, residents of Vista Royale, and residents of nearby communities to contact ADOT and voice their opinions about the ADOT "Recommended Alternative". They were asked to also recommend the Vista Royale proposal which was referred to as the "VR Green Alternative". The "VR Green Alternative" is a document that not only shows a compromise corridor drawn on a map, but it is also a request that ADOT do all that it can to move the corridor as far from Vista Royale as possible.

After the “VR Green Alternative” document was completed, it was sent to the I-11 Study Team and to the Town of Wickenburg. A “Letter to the Editor” plus a detailed article in the Wickenburg Sun newspaper caught the attention of the Town Council. **They studied the data and came to the conclusion that their intent had been misunderstood by ADOT.** An emergency I-11 Task Force meeting took place resulting in a recommendation being given to the Town Council. The Wickenburg Town Council voted to pass a new Resolution that clearly represented its intent. That Resolution has been submitted to the I-11 Study Team and to ADOT.

THE NEW TOWN OF WICKENBURG RESOLUTION CLEARS A PATH TO THE FOLLOWING LOGIC:

- 1) The direction of the I-11 is dictated primarily by NEED and PURPOSE, terms described by the Study Team (EIS) Guidelines.
- 2) ADOT has been under the impression that the Town of Wickenburg has a NEED and PURPOSE for the I-11 to be near its Town Limits. The current Recommended (Blue) corridor certainly reflects that fact!
- 3) Until now, the NEED of Wickenburg has been in opposition to the NEED of Vista Royale.
- 4) The Town of Wickenburg has passed a Resolution that officially and clearly states (or at least strongly implies) that:
 - a) the Town of Wickenburg has no NEED for the I-11 corridor to be near its Town Limits.
 - b) the TOW supports the NEED of Vista Royale to have the corridor tie point at HWY 93 moved 5 miles Northwest of VR
 - c) the TOW supports moving the path of the corridor westward to return open space to VR
- 5) The NEED of the Town of Wickenburg is no longer in opposition to the NEED of Vista Royale
- 6) We find no other entity that has a NEED in opposition to the NEED of VR.
- 7) Given that VR is the only "entity" presenting a NEED to ADOT for this section of the I-11, it is a logical conclusion that ADOT should honor that NEED.

Beyond NEED and PURPOSE, ADOT consistently talks about trying to avoid solving one problem while creating another. Moving the corridor westward into open country (vacant State Trust Lands) does not create another problem!

NEEDS:

Following is a list of some of the NEEDs that have been expressed by Vista Royale residents:

- 1) **LIFESTYLE:** By now, the Study Team and ADOT should be well aware of the types of homes that are in Vista Royale and the lifestyle of their owners. All of the residents of these upscale homes have moved to Vista Royale because of its moderate isolation, the openness, the beauty, and the accessibility of the adjacent desert. Some build and invest here to escape the cities with their crowded housing and crowded streets. Others build here to escape the weather in their home states where they had already become accustomed to a life with open spaces, beauty and accessibility. A highway like I-11, within 5 miles of Vista Royale will be devastating to the lifestyle of all of these residents.
- 2) **ECONOMIC HARDSHIP:** For the same reasons just listed, people seeking the current Vista Royale dream will no longer consider buying or building in Vista Royale when a highway blocks the view and closes access to the open land to the west. The recent appearance of a detailed corridor, just a line-on-a-map, has crossed the threshold where buyers will no longer accept the risk of a super highway in their backyard. Property values are quickly declining. That fact holds no matter how many years away actual I-11 construction might be.
- 3) **DISTANCE:** The only things that the I-11 can offer Vista Royale are things that are bad. Vista Royale NEEDS distance; distance from bright lights that ruin the dark sky, distance from the noise of constant traffic that ruins the peaceful atmosphere, distance from the structures and fences that block access to the open desert, distance from a multi-level interchange that would block out the mountain views, and distance from all the things that VR residents thought they had escaped when they left the cities and moved to Vista Royale.

WHAT HAVE WE MISSED?

At this point, we think we have provided very logical and convincing reasons for moving the I-11 corridor 5 miles away from Vista Royale. But, we need to ask, have we considered everything?

Politics:

We have no way of knowing what politics are hidden out of our view. It is curious to think about why Highway 93 has been upgraded to I-11 standards out to the exact location that the corridors under study are slated to attach. Has a tie point decision already been made without the public input required by the study? That and a dozen other “conspiracy theories” have been brought to our attention but are things that we are unable to address. We trust that the EIS Study will be fair to the Needs of the citizens and not to the needs of the politicians.

Unofficial data:

VR has participated in discussions with Wickenburg that are pertinent to the Needs of VR but were not officially relayed by Wickenburg to ADOT.

The Wickenburg Resolution implies that Wickenburg has no need for the I-11 to be near its northwest Town Limits. It doesn't specifically make that statement. It also does not specifically make the statement that moving the I-11 tie point will benefit Wickenburg. Wickenburg has talked about that benefit. The benefit is based on the fact that Wickenburg cannot afford to annex Vista Royale (hence part of the reason that the Town never intended for the I-11 to be close to VR). And, it cannot afford to annex beyond Vista Royale. However, Wickenburg has said that commercial interest at MP186 could be attractive to, and financially supported by, Yavapai County. Development near MP186 and between Wickenburg and MP186 would mean more business for Wickenburg at no cost to Wickenburg.

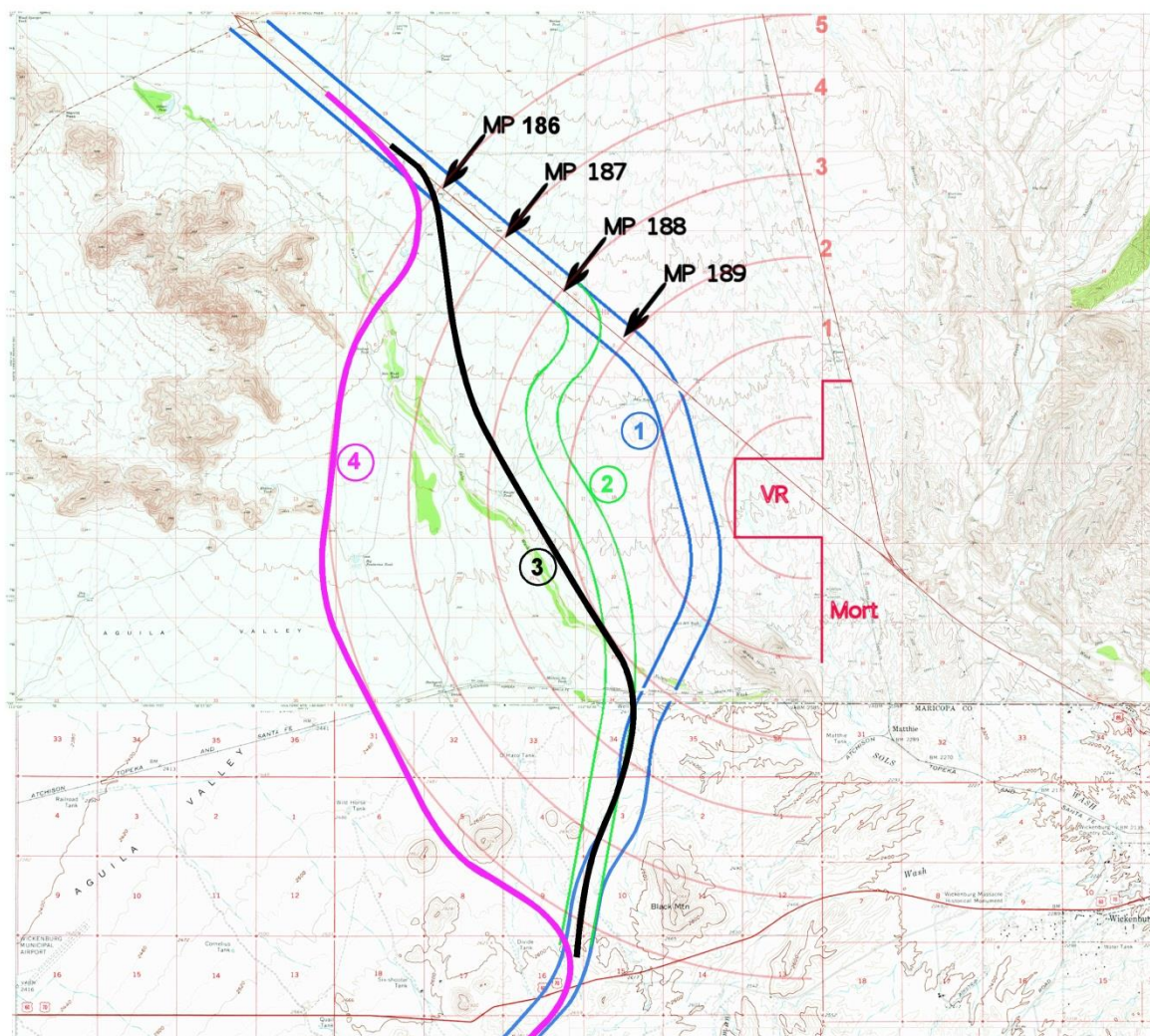
Following that line of reasoning, it can be said that more development within VR would also mean more business for Wickenburg at no cost to Wickenburg. Conversely, the location of I-11 to a point near VR would stop construction on the 50+ vacant lots in VR and that potential business for Wickenburg would be negated.

Engineering / Eliminated Options:

There have been dozens of calls to move the corridors back to an Eliminated Option. We realize that this is not likely an option at this point, although that might satisfy the NEEDS of VR. There have been discussions that the mistaken NEED of Wickenburg to have the I-11 corridor near its northwest Town Limits may have been a deciding consideration in the elimination of other corridors. If so, perhaps it is logical to revisit those corridors.

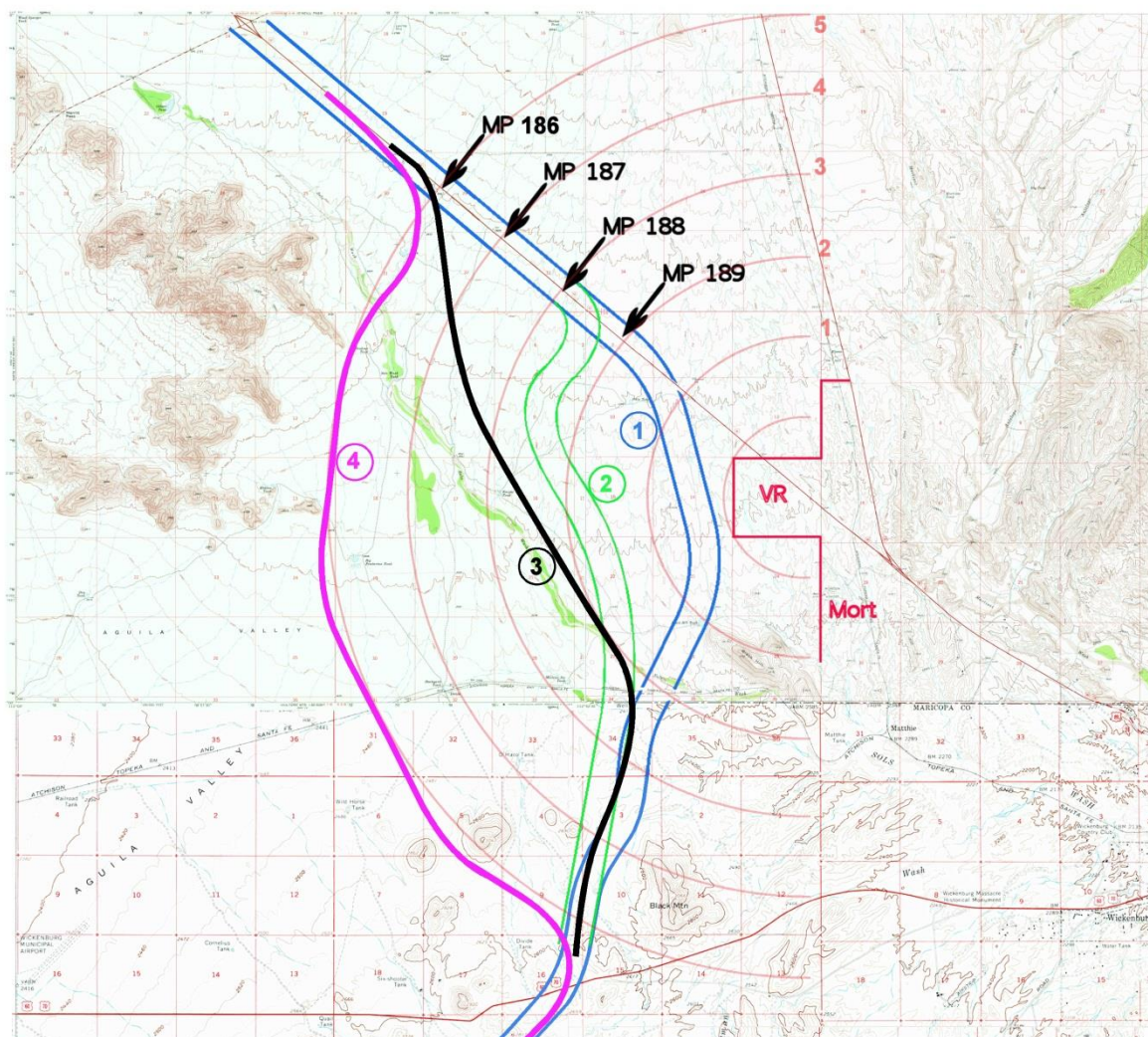
There has been considerable input regarding specifically how and why the corridor should weave through the terrain west of VR. We recognize that these points are an ADOT Engineering responsibility and we recognize that input of this type will likely do little to support our plea.

THE EVOLUTION OF THE VISTA ROYALE PROPOSED CORRIDOR



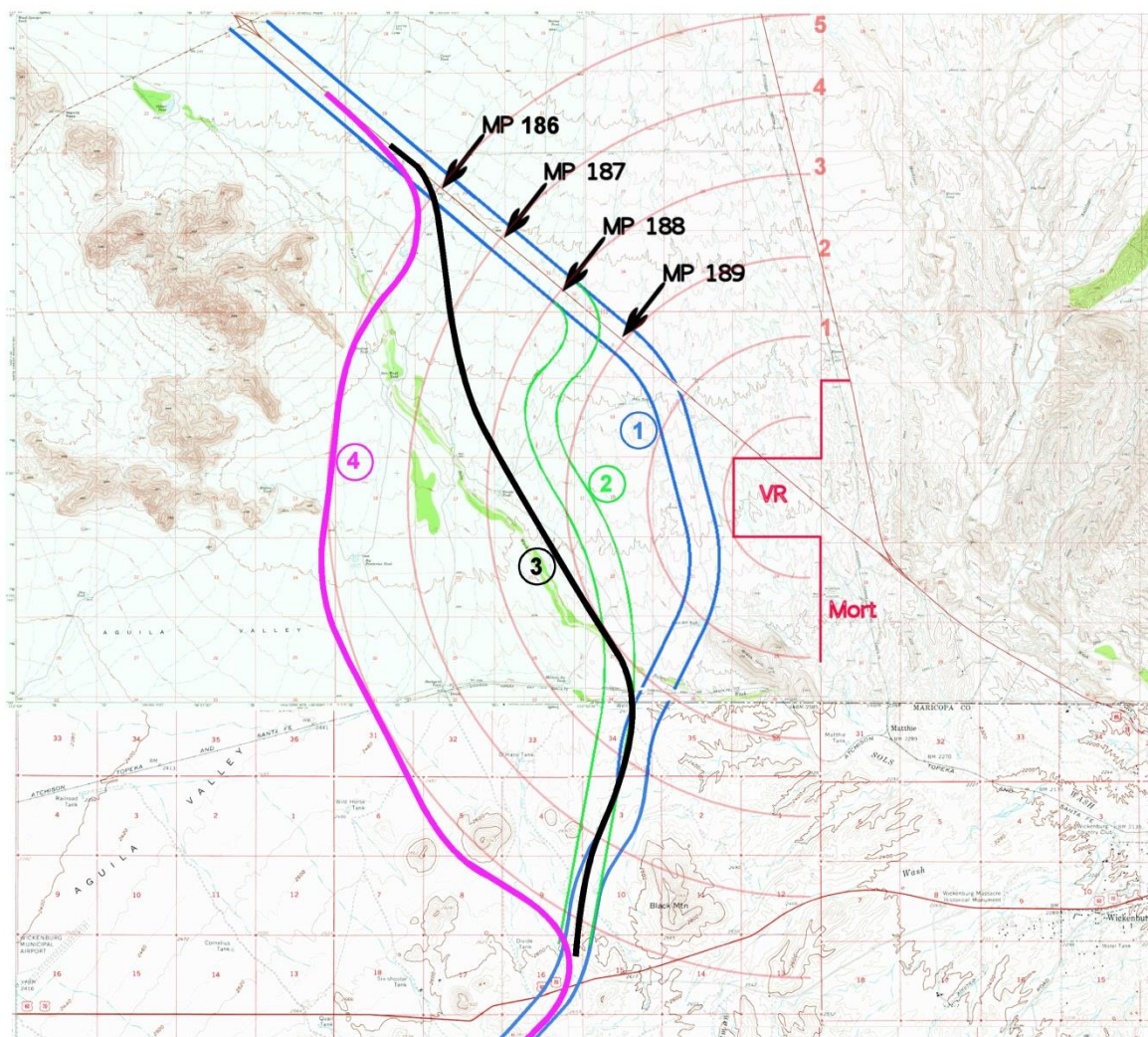
- ① Corridor 1: The original ADOT "Recommended Alternative"

Map 1: April 30, 2019: ADOT designs a corridor with the belief that the Town of Wickenburg needs the I-11 corridor to be as close as possible to the Wickenburg Town Limits.



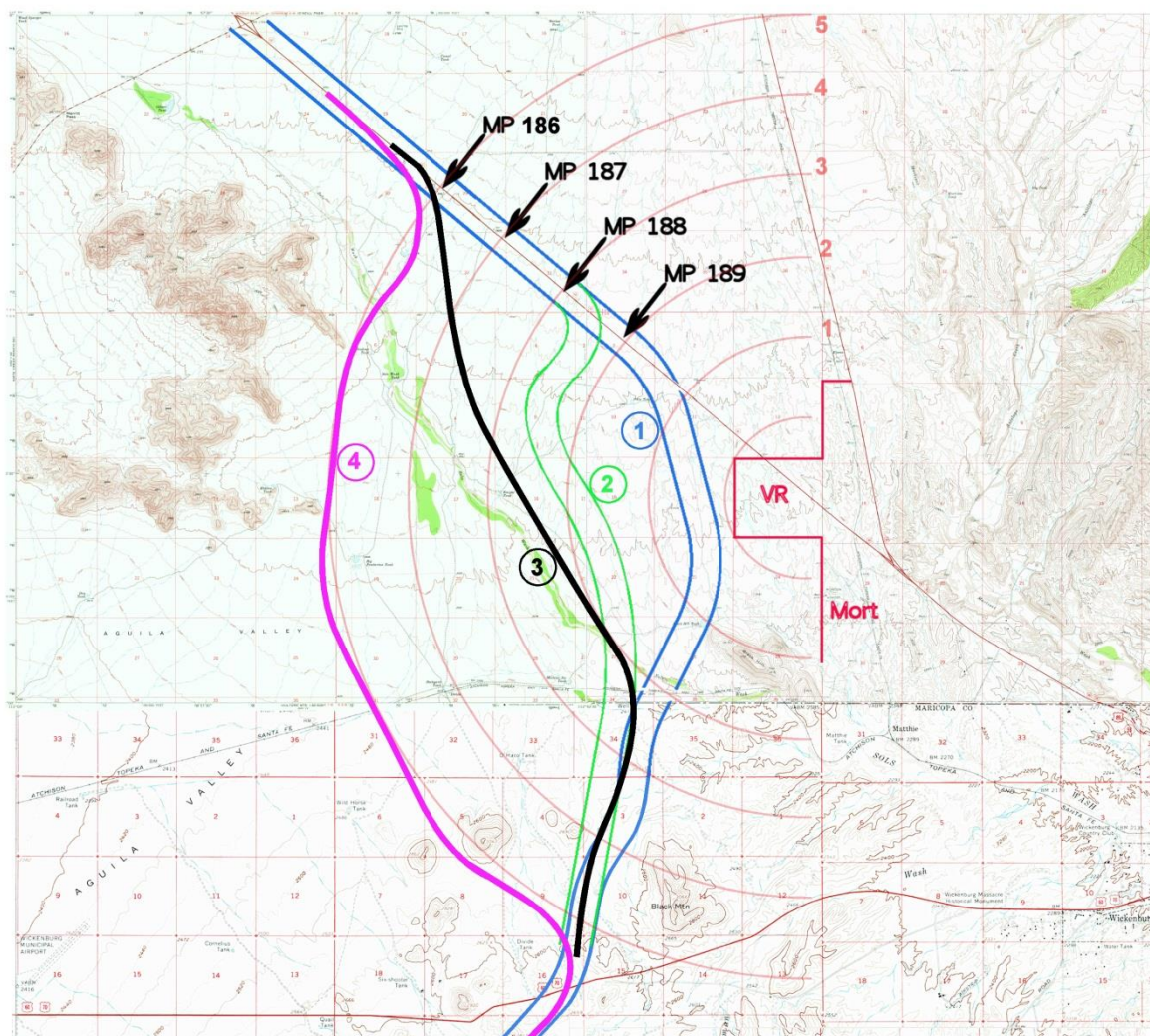
② Corridor 2: “The VR Green Alternative”

Map 2: May 7, 2019: Vista Royale presents a compromise corridor (VR Green Alternative) to ADOT assuming that the connector point at Highway 93 was permanently fixed. This was our starting point on a plan to revise the ADOT corridor.



③ Roadway 3: Town of Wickenburg “Proposed Roadway”

Map 3: June 17, 2019: In response to the outcry from Vista Royale residents and friends, the Town of Wickenburg passes a Resolution indicating that it DOES NOT need the I-11 corridor to be near its northwest Town Limits. The Town supports moving the tie point to Mile Post 186 and it supports moving the corridor path more westerly.



- ④ Roadway 4: This roadway is the currently preferred request to ADOT by Vista Royale. The preferred roadway is called “VR2”

Map 4: June 25, 2019; Vista Royale agrees with the Town of Wickenburg’s Resolution to move the Highway 93 connector point to Mile post 186. Vista Royale requests that the path of the corridor be moved a distance to the west in addition to that proposed by the TOW. This will meet the Need and Purpose of Vista Royale, and is the Preferred Solution!

THE RIGHT THING TO DO:

The overall I-11 project is no doubt good for our country. The cost to certain individual citizens will be high.

The EIS online map of the I-11 presents a very scary overview. The I-11 highway creates a path of unavoidable destruction, hardship, and anguish for probably many hundreds of people.

That doesn't have to be the case for Vista Royale. The Vista Royale case presents an opportunity to easily resolve one conflict without creating another!

Instead of degrading the lives of a hundred people, make a hundred people happy! Simply move the I-11 corridor to the open desert 5 miles away.

Thank you,

The Vista Royale I-11 Study Team

With the support of:

Every concerned citizen who has written, emailed, or called the I-11 Tier 1 EIS Study Team or ADOT expressing opposition to the location of I-11 near Vista Royale.

To the ADOT I-11 Tier 1 EIS Study Team,

Within the last two months, I have seen a flurry of articles and letters to the editor in The Arizona Daily Star regarding the proposed Interstate 11 through Avra Valley, west of Tucson. I have read a variety of perspectives, including studies done by its proponents showing possible negative impacts, and I would like to add “my two cents worth” (more like a nickel) to the debate. I’m not using canned ‘talking points’ but am speaking solely from my own point of view.

The original intent of the proposed highway, even as recently as about 2015, was to follow I-10 from I-19 to somewhere south of Phoenix: “The Fixing America’s Surface Transportation Act, or FAST Act, formally designates Interstate 11 throughout Arizona. It states that **the I-11 corridor will generally follow** Interstate 19 from Nogales to Tucson, **Interstate 10 from Tucson to Phoenix**, and US 93 from Wickenburg to the Nevada state line. From there, the Interstate 11 corridor extends north through Nevada, and is designated as an interstate highway north of Las Vegas, through Reno, connecting to Interstate 80.”

More recently, however, developers with dollar signs in their eyes have somehow managed to replace this sensible plan with one that will desecrate the Avra Valley area. While I am not a “stakeholder” who lives in that area, I have visited it 85 or more times over the last 12 years, feeling more at home there than I do in the Tucson neighborhood in which I live.

Opposition to this highway need not be seen as merely a typical standoff between NIMBY Luddites versus modern progress. Apparently there is a (great) need for the highway, of which I was previously unaware. But, in my opinion, the proposed Avra Valley alternative has few – if any – benefits to Avra Valley and Tucson itself. It is not worth the net loss of tourist dollars, potential loss of business dollars to the (bypassed) Tucson economy, and the destruction of unspoiled acreage along its path.

Personally, I cringe to think that the views to the south/southwest/west, which can be seen from certain vantage points near the Arizona-Sonora Desert Museum, would be forever altered by such a project. Surely the I-11 planners have not made this much of a concern, but at least detailed studies have been done on the negative impacts on the views for tourists, which I will mention in the next paragraph. The views that I speak of are panoramic – nearly 180 degrees – and span from the south-southeast (east of the Santa Rita Mountains, 35-40 miles away) to the southwest (south of Baboquivari Peak, 60+ miles away), and to the northwest (to the Silverbell Mine, nearly 20 miles away). Such unobstructed views draw professional photographers (a couple of whom I have met and talked to during my visits) and have afforded this letter writer some of the best memories (and photographs) of any place he has visited in his 3+ decades of living in Tucson. These views would unavoidably be marred by dust kicked up by the ongoing construction period (not to mention possible “Valley Fever” cases), and a finished highway would continuously scar the once-unmarred view.

I came across lengthy, detailed studies that discuss the impact on the “viewscape” – how the highway would impact the views from different vantage points, and how it would affect various different groups that are doing the viewing, such as: 1) Delivery people, passing through quickly, would not care. 2) Avra Valley locals would lose their homes and businesses to the construction, but others farther away might not care as much, which is debatable. But 3) tourists and local visitors to the Arizona-Sonora Desert Museum would care tremendously. It is one of the top 3 to 5 tourist attractions in the Tucson area. The ‘viewscape’ study makes it clear that tourists and visitors to the Museum would be most affected by I-11's construction and ongoing use, because of mostly unobstructed views to the west. As it stands now, the views are as relatively pristine as are possible.

As for nearby Saguaro National Park West, another tourist magnet, several hills would obstruct views of the highway, but in most areas of the Park, visitors would still be negatively impacted by the ongoing construction and operation of the proposed highway. Some of these tourists and visitors may decide the overall experience is no longer satisfying and head elsewhere, but at the very least, the quality of their visits will be diminished. This does not even touch upon the possible impact to the relatively recently-dedicated Ironwood National Park to the northwest, impacts to Kitt Peak to the west, and probable archaeological finds along the entire route.

While I am not 'anti-development' by any means, I believe that the profit motive of a relative few should not outweigh the sustainable financial tourist and visitor benefits of the many thousands who come to the far west of Tucson to get away from development and experience unspoiled nature. Some may think the desert area of Avra Valley is barren and unexceptional, but just visit a few times, sit and listen (best done in cooler times of the year) and many plants, animals and birds will show themselves or be heard in a short time. Those who are not attuned to nature might not care. But for those who are, the proposed highway would be a slap in the face.

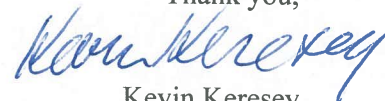
Based on what I have read, the Las Vegas area and even Buckeye, Arizona are far along in preparation for the highway, so it seems as though the I-11 is a "done deal," due to its perceived usefulness for future growth and shipping needs. I am writing this to suggest that the original 'footprint' of I-11 be revisited, which would necessitate improvements to Interstate 10. Among the improvements, dust mitigation would – at long last – need to be part of the equation north of Tucson to the Eloy area, to prevent potentially deadly dust storms and 'haboobs', which often affect Phoenix as well.

Thinking ahead: by the time the highway would possibly be built, the inevitable self-driving trucks could use I-10 during non-peak hours to reduce congestion during peak hours. Perhaps the railroad can also be part of the solution to the increased shipping needs. Plans involving light rail, tunneling under I-10, or building a second tier above the existing I-10 all seem a bit far-fetched and prohibitively expensive to me, but some believe them to be viable options.

Please follow the original I-10 concept and consider the overall destructive impact of I-11 plowing through Avra Valley and points north. The sheer amount of studies, environmental and otherwise, would take years. Acquiring permission and permits from a multitude of agencies, tribes and stakeholders, and fending off lawsuits from various parties would vacuum up many millions of dollars and thousands of man/woman-hours better spent on improving I-10 as part of I-11's southern leg, and in a much more timely manner. Tucson would therefore not be "bypassed," and the Avra Valley area would not be inundated by sudden change that will forever alter its character for the worse, wiping out the very community that supports its few viable businesses.

Developers will still develop, but their visions of a gravy train of mushrooming growth to the west of Tucson would have to be shrunk to a more reasonable scale. Please do not let short-term financial concerns trump the long-term impact to tourism that such a proposed highway would so negatively affect.

Thank you,



Kevin Keresey
3470 E. 2nd St. #3
Tucson AZ 85716



Partnering • Planning • Projecting

To: PAG Region Jurisdictions

From: John Liosatos

Subject: Integration of the Congestion Management Process (CMP) into the PAG TIP Process

Date: August 17, 2010

CC: Cherie Campbell, Tim Thurein and Paul Casertano

All –

On July 1, 2010 the PAG Regional Council adopted a regional Congestion Management Process (CMP) for the PAG region. The CMP enhances sound planning practices but is also required by federal transportation legislation for all Transportation Management Areas, (areas greater than 200,000 in population). Implementation of the congestion management process must be integrated into the COG/MPO regional transportation (TIP & RTP) planning process.

This memo reviews what the CMP is, how it will be incorporated into the TIP process and what requirements jurisdictions need to address during the PAG TIP process. The CMP will be a discussion item on the agenda for the August 17 TIP meeting.

What is the CMP? The federally mandated PAG Congestion Management Process (CMP) is a tool to address congestion throughout the region by helping define and measure congestion as well as identifying appropriate strategies to reduce that congestion as part of the long-range transportation plan (RTP) and the short-range transportation program (TIP)/project development process. The PAG CMP also establishes a congestion-related performance monitoring and reporting system.

In other words, the feds, as well as more and more of our constituents, want the region to make sure we have considered other alternate mode solutions to address congestion rather than just building roadways. While capacity-expanding projects are not prohibited, the CMP requirements mean that the MPO must consider alternatives to capacity increases, and that measures be incorporated into the project to make the most efficient use of the new capacity once it has been constructed.

In TMAs that are designated non-attainment for ozone or carbon monoxide, federal requirements prohibit significant capacity increasing projects unless they come from a CMP. While the PAG planning area is not currently classified as nonattainment, a future ozone nonattainment designation is likely and PAG is taking a proactive approach to ensure that all “significant” single-occupant vehicle (SOV) capacity projects are developed as part of our CMP. The procedure, as described below, was discussed in detail and favorably considered by the TIP Subcommittee at its April 2010 meeting.

How will the CMP change what we do?

The CMP procedure defines new “significant” capacity increasing projects as adding at least one travel lane for a mile or more. It requires these “significant” projects provide CMP related

information as part of the TIP project application. Local jurisdictional project sponsors will answer the CMP questions below and complete the one-page "PAG CMP Strategies Toolbox Worksheet" (attached).

- Is the project considered to be a "significant" project according to PAG's Congestion Management Process (CMP)?
- Are Federal funds being used or requested to support the project?
- Does the project provide a significant increase in single occupant vehicle (SOV) capacity?
- Does the project address a congestion issue as identified by PAG's transportation system reporting or other source?
- Does the project incorporate congestion management strategies as identified in the "PAG CMP Strategies Toolbox Worksheet" or otherwise?
- Please identify the congestion management strategies included as part of the project using the "PAG CMP Strategies Toolbox Worksheet."

The procedure for review of all "significant" SOV projects is designed to help:

- Ensure that significant SOV projects consider and, when applicable, include congestion management strategies as part of the project development process.
- Document the congestion management strategies to be included with the significant SOV project.

The "PAG Congestion Management Strategies Toolbox Worksheet" is a checklist of congestion management strategies that are considered appropriate and applicable to the region (see attached). This checklist is designed to facilitate the documentation of strategies that will be included with the significant SOV project, but it is not necessarily all inclusive of the strategies that may be used. Local agencies have the flexibility and latitude to incorporate any additional appropriate congestion management strategies into their project, and this is encouraged by PAG. Agencies are also encouraged to consider congestion management strategies as part of non-capacity increasing projects.

At this point, the TIP criteria sheets attached have been changed to reflect the need for "significant" projects to fill out the CMP worksheet but they DO NOT reflect any scoring associated with the CMP worksheet.

Staff recommendation for the August 17, 2010 TIP Meeting:

- Consider whether the "minor" and "major" project classifications need additional criteria sheets or whether the existing sheets should/could be modified to address the "significant" definition associated with the CMP.
- Consider adding/adjusting scoring for the "major" project criteria sheet to reflect additional points for projects that address congestion areas as identified by the CMP.
- Formal endorsement of CMP integration into the TIP application.

Complete Streets Resolution December 10, 2015

Resolution by the Regional Council of Pima Association of Governments Supporting Complete Streets

Whereas, the term “Complete Streets” describes a comprehensive, integrated approach to designing, constructing, and operating roads, streets, and adjacent rights-of-way in a way that supports safe and convenient travel along and across streets for all users, including pedestrians, bicyclists, motor vehicle drivers, public transportation riders, commercial vehicles, and for people of all ages and abilities, including children, youth, families, older adults, and individuals with disabilities; and

Whereas, the benefits of Complete Streets include improving safety for all users; expanding quality transportation choices for non-drivers, persons with disabilities, and for those who cannot afford a car, choose to live car free, or occasionally prefer to use different modes of transportation; providing better bike, pedestrian, and transit connections to employment, education, residential, recreation, retail centers and public facilities; promoting healthy lifestyles and recreational opportunities; and creating more livable communities; and

Whereas, where Complete Streets principles are integrated into the design and construction of new or improved facilities and used to retrofit existing roadways, the entire transportation system better meets all user needs, and

Whereas, pedestrian and bicyclist fatalities account for 1 in 4 roadway fatalities in the region, and designing streets using complete streets principles can reduce injuries and fatalities for these most vulnerable users; and

Whereas, the Complete Streets concept does not stipulate specific street standards, but instead encourages a context-sensitive design approach, fitting the roadway design within the context of the neighborhood or community, recognizing that all streets are different and user needs will be balanced; and

Whereas, the jurisdictions within Pima County already consistently incorporate many Complete Streets principles into planning, design, construction, and operation of transportation facilities, making significant progress in recent years in improving the quality and availability of bicycle and pedestrian facilities; and

Whereas, streets are key public spaces that shape the experience of residents and visitors to the cities, towns, and communities of Pima County, directly affecting public health, welfare, community perception, and business attraction and providing the framework for current and future development; and

Whereas, Complete Streets which incorporate green infrastructure (GI) enhancements have been supported by PAG’s Regional Council Resolutions recognizing GI as a cost-saving approach which not only creates pedestrian buffers and calms traffic, but meets multiple objectives by managing runoff to vegetate the streetscape, which improves stormwater quality, flooding, and erosion conditions, decreases cost of irrigation, improves the aesthetic quality of the community, increases adjacent property values, and increases shade to reduce health effects of heat exposure; and

Whereas, the general and comprehensive plans of the jurisdictions of Pima County contain policy statements and strategies that are consistent with a Complete Streets approach; and

Whereas, the approved Pima Association of Governments 2040 Regional Transportation Plan and the 2014 PAG Regional Pedestrian Plan both specifically encourage Complete Streets as a means for meeting regional transportation goals; and

Whereas, Pima Association of Governments wishes to encourage walking, bicycling, and public transportation use as safe, convenient, environmentally friendly, and economical modes of transportation that promote health and independence for all people;

Whereas, Complete Streets provide high quality, safe, and accessible transportation options as Pima County’s population ages and the mobility needs of many residents change; and

Whereas, recent data on obesity and public health identifies a relationship between land use, automobile dependency, and poor health, which can and has been improved for communities exercising the principles of Complete Streets; and

Whereas, Pima County is close to exceeding National Ambient Air Quality Standards for ozone concentrations, and designing streets to be comfortable and safe for all users may encourage people to travel by different modes and can be an important part of the region’s strategy to reduce tailpipe emissions.

Now, therefore, be it resolved that Pima Association of Governments hereby recognizes the important benefits of Complete Streets in meeting the region’s transportation goals by enabling safe travel by all users, including pedestrians, bicyclists, public transportation riders and drivers, and people of all ages and abilities, including children, youth, families, older adults, and individuals with disabilities.

Be it further resolved that Pima Association of Governments supports member jurisdictions in continuing to apply Complete Streets principles in planning, designing, and constructing new transportation facilities and in retrofitting existing roadways; in addition, PAG encourages member jurisdictions to develop locally appropriate Complete Streets guidance or other policies and track performance measures for Complete Streets implementation.

Be it further resolved that Pima Association of Governments assists regional partners where requested with inter-agency coordination, development of technical guidance, creation of model policies and street designs, and other appropriate efforts to further the region’s goals of making all roads and streets and other elements of the public right-of-way complete, safe, and accessible for everyone.



TO Whom it May Concern
I oppose the recommended
Alternative route described
in the tier 1 DEIS for
Interstate 11.

- I believe that the recommended
Alternative route would damage
natural resources and the
experience because it would
run near Saguaro National
Park West, Ironwood Forest
National Monument, and the
Tucson Mitigation Corridor.
Once gone, the se plants, saguaros,
and animals will never come
back.

- The recommended Alternative
route would cost taxpayers
\$3.4 billion more to build
than co-locating I-11 with
I-19 and I-10.

- By passing / diverting traffic
away from Tucson's downtown

and growing business districts

Knight, N
I-3522

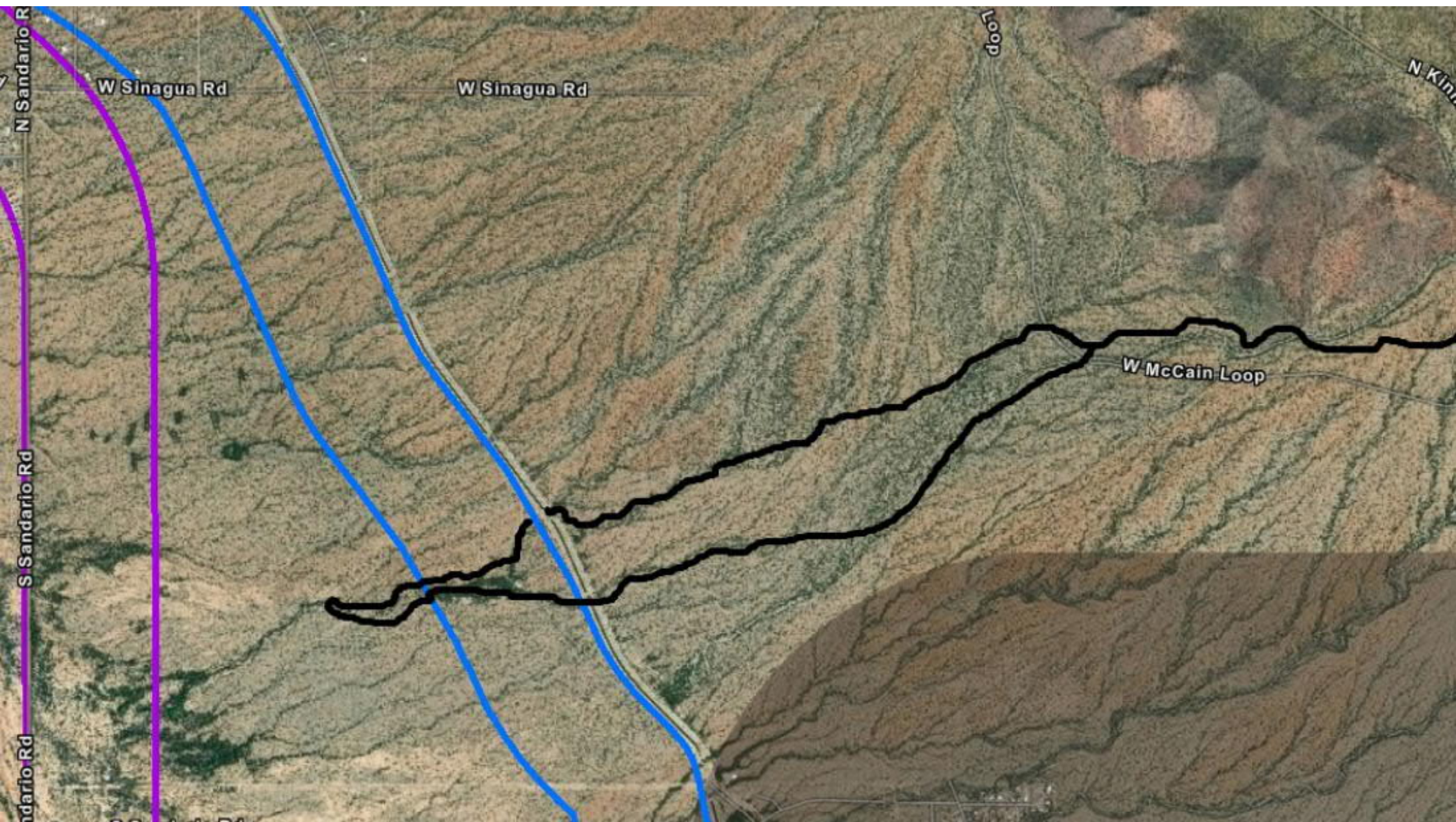
would really hurt business

There are unique, local
businesses that would suffer.
Once gone, they never come
back.

So, in conclusion, I use
"no" on the recommended
Alternative route for
interstate 11.

Thank you.

Nanette Knight
6246A E Fairmount St
Tulson, AZ 85712



July 7, 2019

Kostioshi, N
I-3530

Dear Sars & McKames —

I am writing in response to the Recommended Alternative Route described in the Tier 1 DEIS for Interstate 11.

I oppose the alternative route because:

- the route would cost \$3.4 billion more
- of the significant increase in light, noise and air pollution.
- of the proximity to the Saguaro NM (w/in 1300 feet) and The Ironwood Forest NM (w/in 400 feet in many locations).
- wildlife corridors would be fractured by a new freeway.
- this freeway would increase "night light" thereby impacting Kitt Peak Observatory's studies & research.
- this would impact private property owners, property values & destroy the rural character of the land.

In conclusion, this idea is erroneous - why would we need this extra freeway when there is a route from Nogales to Las Vegas already.

Sincerely,

Nita Kostioshi (Citizen from 1965)


To: I-11 Study Team

I OPPOSE THE RECOMMENDED ALTERNATIVE ROUTE DESCRIBED IN TIER 1 DEIS FOR I-11.

I SIMPLY DO NOT UNDERSTAND THE LOGIC OF DESTROYING COUNTLESS ACRES OF LAND BETWEEN SAHUARITA AND OCA GRAND FOR AN INFRASTRUCTURE THAT ALREADY EXISTS IN I-10. THE ENVIRONMENTAL AND ECOLOGICAL RISKS ARE TOO GREAT. THE HABITAT AND ITS NATIVE INHABITANTS WILL SUFFER. AND FOR WHAT? SPECIAL INTEREST GROUPS REWARDED WITH \$3.4 BILLION IN BUSINESS.

PLEASE DO NOT USE THIS BYPASS. PERHAPS USE THE FUNDS TO FIX THE CURRENTLY FALLING ROADS RATHER THAN BUILD MORE ROADS ARIZONA WON'T MAINTAIN.

RESPECT OUR DESERT! DO RIGHT BY THE PEOPLE. AND REMEMBER, CORPORATIONS ARE NOT PEOPLE - AND NEITHER IS THE GOVT.



PLEASE DO THE RIGHT THING. DO RIGHT
BY YOUR KIDS AND GRANDKIDS.
THIS WILL BE YOUR LEGACY!

BEST REGARDS

A handwritten signature in blue ink, appearing to read "Jeff", with a large, stylized loop at the end.

Comments for personnel associated with: ADOT
FHWA11
& Participating Agencies

Relating to the Planning & Construction of I-11

14 June, 2019

Mesdames & Sirs:

Adding my voice to the many Arizona residents who have already spoken out against the proposed I-11 freeway plans & construction, my concerns are multifaceted:

Chief among these concerns is the negative environmental impact that such highway construction will entail, both in the building, & then the utilizing phases. It has been argued that we in the Western USA need this new passage, & I question why the need or desire for further growth? It is highly irresponsible to encourage the new growth that this highway will bring when the infrastructure is unlikely to support it. Of course I'm referring to the long-term availability of water in the arid SW. Developers really don't care about this detail, & unfortunately, zoning, laws, & the Business Corporation support new business & all that comes with it. Haven't we developed enough in our fragile desert ecosystem? How much more precious water will need to be diverted, fought over, & stolen from the natural desert habitat? When will our community leaders/politicians develop a conscience in this regard? It is such a poor comment on our society that we value profits over quality-of-life issues. When visiting the open house @ the TCC in May, asking these water-related questions resulted in absolutely no satisfactory answers—the water experts were only concerned with their separate job objectives; they were not responsible for looking @ the big picture ("not my job"). And politicians act as if this is the best solution to some of our traffic problems, because growth is inevitable. Runaway, irresponsible growth does not need to be inevitable if residents do not desire such a negative impact to our quality of life!

You have heard many who have spoken more eloquently than this writer is able about the multifaceted environmental concerns: the negative impact to wildlife, the destruction of our desert's beauty, especially when partaking of nature's bounty on hiking trails in the region, to the tourist trade (is that important to Tucson's economy?) —I am adding my objections to theirs. It has been raised that Kit Peak's Observatory complex will be considerably negatively impacted—is this important?

In addition, local property values will be substantially negatively affected by the freeway's intrusion. Viewing the "Arizona 360" program shortly after the TCC event, I became quite angry @ hearing an ADOT official (name not noted) proclaim that property owners need be concerned, as the proposed routes skirt residences (residents are not likely to be displaced). He completely ignored the obvious—once the project is proposed, planned, & approved, property owners can kiss their quality of life & home values goodbye—what do you think a property adjacent to an I-11 highway will

be worth? In fact, as a former homeowner in Avra Valley, I moved into Tucson in part because of the threat of new highway construction.

Change is inevitable, irresponsible growth & the destruction of the desert do not have to be. I hope that this state's leaders take the many citizens' comments, some with quite creative alternative ideas, seriously & take the correct action (or inaction).

Submitted with Hope,
Alex Lane



MELANIE AJA LANFORD
P. O. BOX 477
27315 W. HAZEN ROAD
BUCKEYE, AZ 85326
Cell: 623-229-2706
Email: azsheeplady@gmail.com

3 July 2019

John S. Halikowski, Director
Arizona Department of Transportation
1655 W. Jackson Street, MD 126F
Phoenix, AZ 85007

Re: I11 ADOT Study – Proposed Route

Dear Director Halikowski:

I am writing to object to the current proposed I-11 route. I request that one of the alternate routes be considered for the following reasons:

- The current proposed route will do the most harm to a farming community that was settled in 1888. There are descendants of the settlers that still live and farm in the Palo Verde, Arizona area. See [Exhibit A](#).¹
- It will displace many, many people from their homes, farming businesses and lands. Not to mention the people who will lose their jobs who work for the farmers that will be displaced due to the loss of farm lands and agricultural businesses (dairies, etc.).
- It will destroy approximately 3,000 acres of private, cultivated farm land and affect many farmers economic viability. Destroying viable agricultural land at a time when the population is growing (from 4.4B in 1980 to 9.6B+ in 2050) and agricultural lands are taken out of production due to urbanization (from 1 acre per person in 1961 to 1/3 acre per person in 2050). See [Exhibit B-1: The Work Bank Group, "Enabling the Business of Agriculture 2015 – Progress Report"](#)²; [Exhibit B-2: The Climate Corporation: Turning Data Into Insight for Farmers](#).³
- It will cost the American taxpayer billions more in tax dollars to build. The alternate routes (especially the Orange Route) will cost less as the roadways have already been acquired years ago.
- We have been told that even if the current proposed route is the one chosen, it will not be built for 15-20 years but in the State of Arizona it is a Full Disclosure State. Basically, those of us who are in the current proposed route will not be able to sell our property as we would have to disclose there would be an Interstate to run through our properties. Our properties will be devalued as we will not be able to sell our properties even if we had to sell

¹ Wikipedia: Palo Verde, Arizona; last edited on 30 April 2018, at 23:26 (UTC).

² The World Bank Group: "Enabling the Business of Agriculture 2015 – Progress Report." Figure 1.1: The global population is expected to exceed 9 billion by 2050; Pages 1-2.

³ The Climate Corporation: Turning Data Into Insight for Farmers; Martin Rand, CEO, VitalFields; "Global: Crop Production Demand Climbing." Declining arable land: 1 acre per person in 1961 to 1/3 acre per person in 2050.

due to death or other circumstances. Those of us have worked our whole lives for our homes and lands to just have the government come and take it all away from us when there are alternative routes that will not affect as many people and their lands and businesses.

- It will ruin the tax basis for the Palo Verde School District with all the private lands removed and put a tax burden on those private property owners that are left. The Palo Verde School will be destroyed as it is in the path of the current proposed route so there will also be a burden to rebuild somewhere.
- It will destroy the Historical Old Highway 80 that was designated an Arizona Historic Highway on September 21, 2018 by an unanimous vote of the Arizona State Transportation Board.⁴

I respectfully request that the current proposed I-11 route be abandoned and one of the alternate routes (preferably the Orange Route) be approved.

Sincerely,



Melanie Aja Lanford

MAL:ww

Enclosures

PC: President of the United States, Donald Trump
Governor of Arizona, Doug Ducey
Senator Martha McSally
Senator Kirsten Sinema
Congressman Tom O'Halleran, AZ 1st District
Congresswoman Ann Kirkpatrick, AZ 2nd District
Congressman Raul Grijalva, AZ 3rd District
Congressman Paul Gosar, AZ 4th District
Congressman Andy Biggs, AZ 5th District
Congressman David Schweikert, AZ 6th District
Congressman Ruben Gallegos, AZ 7th District
Congresswoman Debbie Lesko, AZ 8th District
Congressman Greg Stanton, AZ 9th District
Arizona Senator Sine Kerr, 13th Legislative District
Secretary of Transportation, Elaine L. Chao
Federal Highway Administrator, Nicole R. Nason
I-11 ADOT Tier 1 EIS Study Team

⁴ Tucson Historic Preservation Foundation 2019 – Historic Arizona U.S. Route 80 Designation, William H. Cook, FAIA, 1924-2009, 2018-08-16 and AA Roads; Historic U.S. 80, Page Updated 11-09-2007.

EXHIBIT A

Wikipedia: Palo Verde, Arizona

WIKIPEDIA

Palo Verde, Arizona

Palo Verde is a small populated place in Maricopa County, Arizona, United States. It is located about 40 miles west of Phoenix, and 6 miles southwest of downtown Buckeye.

Brief history

The Palo Verde area was settled in 1886, by John G. Roberts and family. Mr. Roberts helped in the construction of the Arizona and Buckeye canals, served a term as cattle inspector, and was deputy sheriff at Buckeye under three Maricopa County sheriffs.^{[1][2]} One of the first structures built, which still stands today, was the Palo Verde Baptist Church, organized in 1890.^[3]

Despite sharing a name, the Palo Verde Nuclear Generating Station is located in nearby Wintersburg.

Palo Verde exists as a county island within the planning boundary of Buckeye. This precludes any possibility of incorporation for the community, but annexation into Buckeye is a possibility.

In 1995, a train derailment occurred near the town of Palo Verde.



The **Palo Verde Cemetery** was established in 1903 and is located on 29600 West Old Hwy. 80.

References

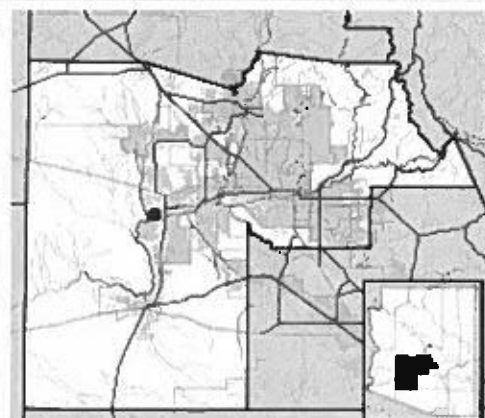
- "Wickenburg Sun Obituaries"; July 30, 1954; page 5]
- Arizona Obituary Archive (<http://obits.arizonagravestones.org/view.php?id=1640>)
- Early History of Buckeye (<http://buckeye4locals.com/history/the-early-days-of-buckeye-az/>)

Palo Verde, Arizona

Populated place



The **Palo Verde Baptist Church** was built in 1890 and is located on 29600 West Old Hwy. 80.



Location in Maricopa County and the state of Arizona

Coordinates: 33°20′53″N 112°40′39″W﻿ / ﻿33.34806°N 112.67750°W﻿ / 33.34806; -112.67750

Country	United States
State	Arizona
County	Maricopa
Elevation	845 ft (258 m)
Time zone	UTC-7 (Mountain (MST))



Grave of John G. Roberts (1874-1954),
founder of Palo verde

Retrieved from "https://en.wikipedia.org/w/index.php?title=Palo_Verde,_Arizona&oldid=839053372"

This page was last edited on 30 April 2018, at 23:36 (UTC).

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EXHIBIT B-1

The World Bank Group

Introduction

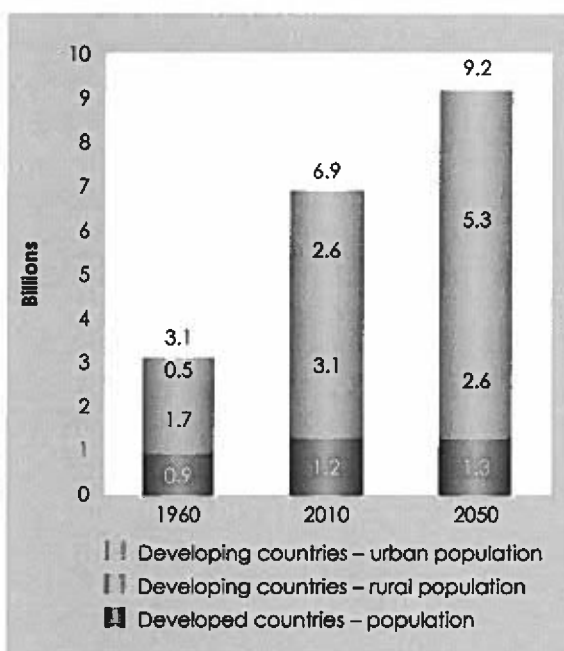
By 2050 the world's population is projected to exceed 9 billion (figure 1.1).¹ Global food demand will increase by an estimated 63%,² propelled not only by the expected population growth but also by an ongoing evolution of diets worldwide. A steady growth in kilocalories per capita is expected at the global level, along with rising consumption of resource-intensive commodities—higher value crops, animal protein and processed foods—driven by the

increasing affluence and richer diets of urbanizing populations in developing regions.

The growth of urban centers in the developing world is a fundamental part of the story. As the population of these areas swells and more people see gains in income and in access to food choices, demand will grow for a range of agricultural products. At the same time, urban markets will need to provide staple foods at sensible prices for the growing numbers of poor people who will live near them. Indeed, the expected growth in global food demand will be driven largely, if not exclusively, by growth in urban food demand in developing regions. This demand is projected to nearly double in 40 years—increasing by an estimated 78%, far more than the modest total increase expected in developed regions. In Sub-Saharan Africa, for example, growth in urban food demand during this period could exceed 300%, and in India, 200%.

While demand for more and better food is growing, supply is increasingly fragile. It is well recognized that crop production is very sensitive to climate change,³ making food provision in the next decades especially challenging. Climate change by 2050 could reduce crop yields by an average of 17%, when compared with a scenario with unchanging climate, and lead to an increase of 20% in crop prices.⁴ The tropics—where many developing countries are located—will be hit hardest by rising temperatures, less rainfall and higher sea levels. Impacts

FIGURE 1.1: The global population is expected to exceed 9 billion by 2050



Source: United Nations 2009.

are likely to be most severe in countries with high transportation costs, where adapted varieties are unavailable and, based on global nitrogen availability simulations, where nitrogen fertilizer use is low.⁵ In highly vulnerable regions, where incomes are meager and most rural households depend on agriculture for their food and livelihoods, more people will face hunger as a result of climate change.⁶

Add water and land scarcity to this scenario. An increasing number of countries are reaching alarming levels of water scarcity; 1.4 billion people live in areas with sinking ground water levels.⁷ Water scarcity is particularly pronounced in the Middle East, North Africa and South Asia regions and is likely to worsen as a result of climate change in many regions. Burgeoning populations mean more demand for land at a time when large parts of all continents are experiencing land degradation, resulting in water and wind erosion, loss of organic matter, topsoil compaction, salinization and soil pollution, and nutrient loss. Other countries are extremely land-scarce, and much of the potential land is suitable for growing crops that are not in high demand. To produce the food and other agricultural products that the future's population will demand, more productive and sustainable use of limited, highly demanded natural resources needs to be ensured across the entire agricultural production chain.

Nations need to be prepared to address this compelling prospect. The growing demand for food calls for enhancing agricultural output, efficiency, and distribution, all while advancing sustainability and making the agribusiness sector more inclusive. Increasing food production in the face of deteriorating soils, scarce natural resources and climate change is, in itself, an enormous challenge. To this must be added the need to connect producers and the urban market over increasing distances. Postharvest

processes—encompassing transport, standards implementation, food safety and market knowledge—will become increasingly critical to a successful market process for agricultural products. The required food supply increase can be achieved if the necessary investments are made and adequate regulations and policies are put in place.⁸

Efforts to meet growing food demand cannot be separated from the ongoing battle to eradicate poverty, particularly in rural areas. Agriculture-led growth offers an unusually powerful vehicle for a broad reduction of poverty.⁹ The agribusiness dimension of rural development—particularly in agricultural marketing and agroprocessing—often prove critical to successful agricultural growth.¹⁰ Without well-functioning agricultural markets, farm productivity gains lead to temporary production surges and price collapses. Better access to markets is needed to maintain production incentives and permit households to specialize and enable them to move to high-value products and value-added activities.

A pivotal role for smaller-scale producers

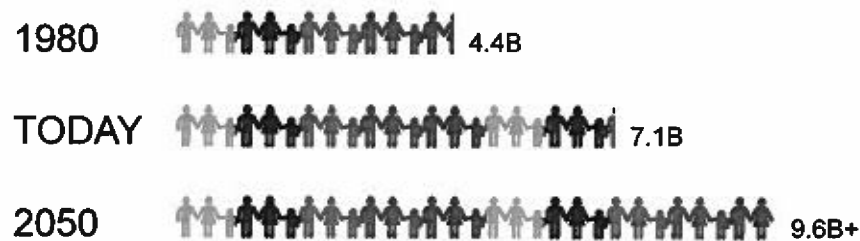
Smaller-scale producers can play a pivotal role in increasing food production and availability, as they command large areas of land, especially in developing countries, where they provide most of the food supply. Up to 70% of the population in many countries of Asia and Sub-Saharan Africa form part of smallholder farm households, both consuming the food they produce and selling their marketable surplus. In the European Union, 70% of the almost 12 million farms are less than 5 hectares. Globally, smallholder farms are estimated to number around 500 million, typically ranging between 0.5 and 10 hectares in size and averaging less than 2 hectares.

EXHIBIT B-2

The Climate Corporation

Global: Crop Production Demand Climbing

RISING *population*



Source: <http://esa.un.org/unpd/wpp>

GROWING *middle class*



Source: <http://www.reuters.com/middle-class-infographic>

RISING *animal protein consumption*



Source: UN FAO Food Balance Sheet, World Health Organization Global and regional food consumption patterns and trends*

DECLINING *arable land*



Source: The World Bank, Food and Agriculture Organization of the United Nations (FAO-STAT), Monsanto Internal Calculations

EXHIBIT C
Historic Arizona
U.S. Route 80 Designation

TUCSON HISTORIC PRESERVATION
FOUNDATION

Historic Arizona U.S. Route 80 Designation

On September 21, 2018, the historic alignment of Arizona U.S. Route 80 was designated a Historic Arizona Road by a unanimous vote of the Arizona State Transportation Board. Since 2012 the Tucson Historic Preservation Foundation worked to designate the old route across the state of Arizona from Yuma to Douglas.

Beginning in 2012 the Tucson Historic Preservation Foundation began the inventory, survey and mapping of the historic alignment of U.S. Route 80. (1926 – 1977) across the State of Arizona from the New Mexico border through Douglas, Bisbee, Benson, Tucson, Florence, Apache Junction, Mesa, Tempe, Phoenix, Buckeye, Gila Bend and Yuma into California. In Tucson, the alignment follows Oracle Road, Drachmann, Stone Avenue, South Sixth Avenue and Benson Highway and is an important historic corridor that represents the transformation and development of Tucson in the 20th Century. In summer 2016 the City of Tucson submitted the National Register of Historic Places nomination for the Miracle Mile Historic District (the northern segment of this highway in Tucson).

TUCSON HISTORIC PRESERVATION
FOUNDATION

resource. Like Route 66 to the north, the Arizona segment of US 80 shaped the west. Along its curb developed roadside architecture: service stations, diners, attractions, neon-signs, motels and a host of other resources wove into communities and through rural vistas combining to create a distinct and unique sense of place.

The Arizona Department of Transportation Parkways, Historic and Scenic Roads Advisory Committee met on June 20, 2017 and unanimously recommended Designation of the Historic Arizona US Route 80. The Arizona Transportation Board voted to designate the Route on September 21, 2018.

TUCSON HISTORIC PRESERVATION FOUNDATION

In July of 2016 the Tucson Historic Preservation Foundation submitted the application to initiate the designation of Historic Arizona U.S. Route 80 to the Arizona Department of Transportation Parkways, Historic and Scenic Roads Advisory Committee for consideration.

The Arizona, U.S. Route 80, Historic Highway application was prepared by the Tucson Historic Preservation Foundation and was developed through numerous site and corridor surveys and with mapping support from Tyler Theriot and Desert Archeology, INC. The application utilized the superb work of Jeff Jensen's publication and detailed guide "Drive the Broadway of America! The U.S. 80 and Bankhead Highway across the American Southwest" and Good Roads Everywhere: A History of Road Building in Arizona prepared for the ADOT Environmental Planning Section by Melissa Keane and J. Simon Bruder and includes the suburb national context essay: U.S. Route 80 The Dixie Overland Highway by Richard F. Weingroff of the Federal Highway Administration. In addition to the available secondary sources, primary research was undertaken at University of Arizona special collections, Arizona Historical Society research library and extensive field research along the route.

The application documents the historic resources connected by Arizona U.S. Route 80 and identifies the intrinsic qualities that define the Arizona U.S. Route 80 experience. The application provides a historic context that tracks the early highway development connecting with extant physical resources including: sites, objects, buildings, structures, monuments and districts along the way. The Designation of Arizona Historic US Route 80 connects to the designation of Historic US Route 80 by the California Department of Transportation and similar designation efforts in Texas and in the south.

DOWNLOADABLE RESOURCES

ARIZONA HISTORIC US ROUTE 80 APPLICATION SUBMITTED TO ADOT JULY 2016

[download](#)

RELATED STORIES

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The Foundation is producing a book on the work of Tucson... [READ MORE](#)

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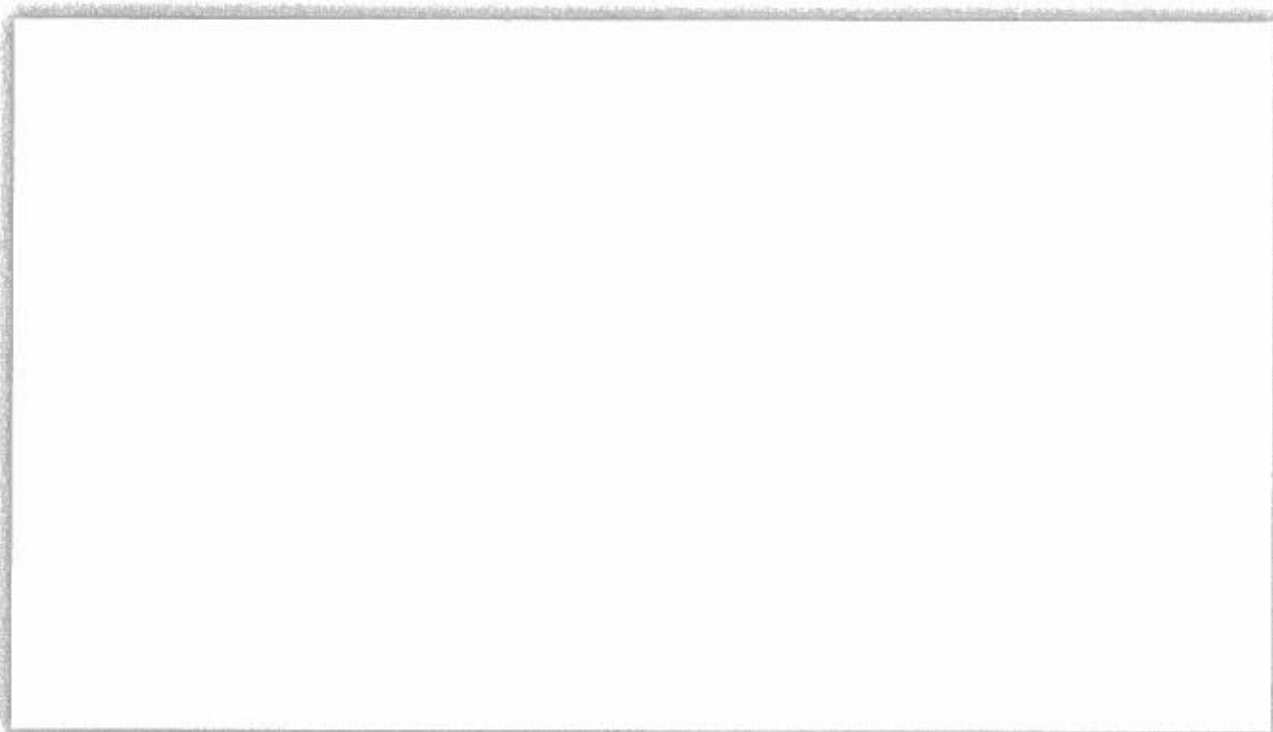
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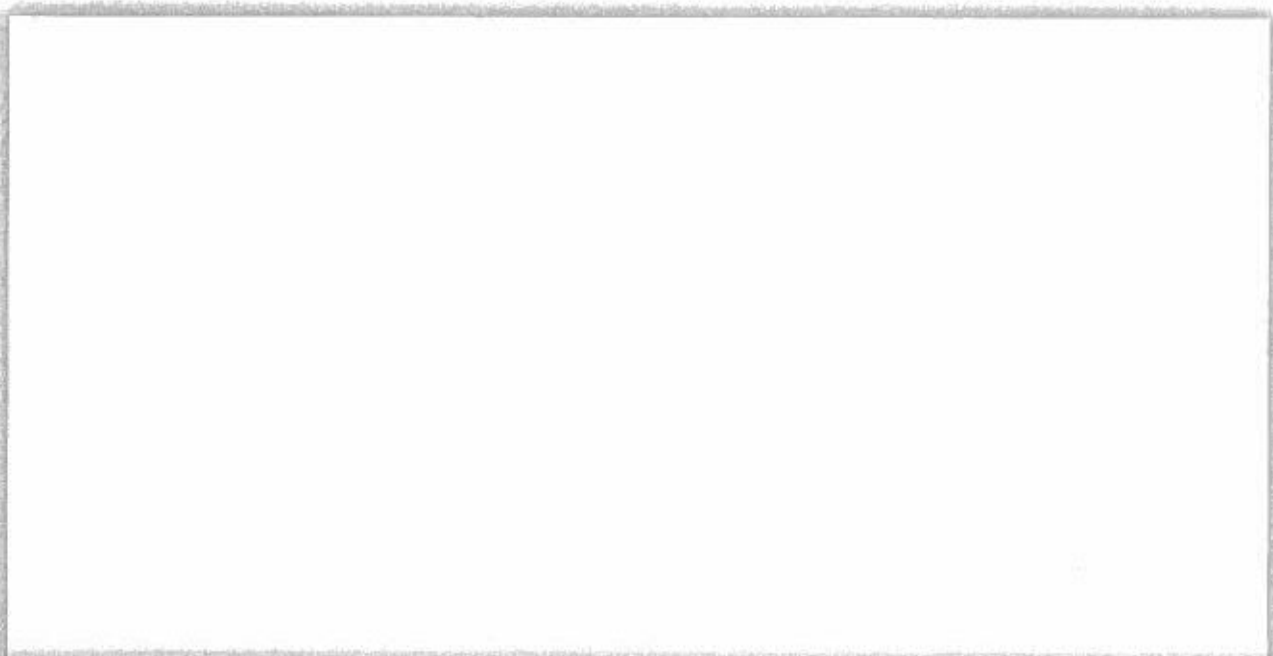


Harwood Steiger

2019-04-28

...

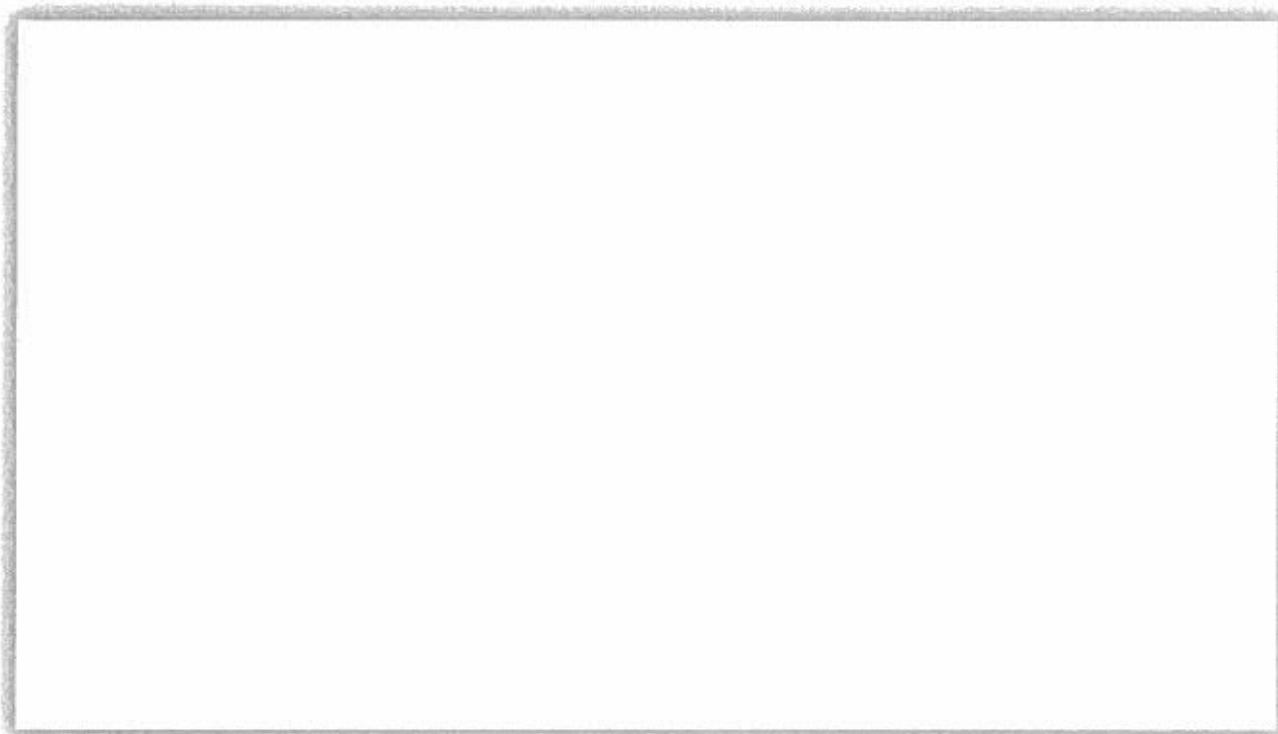
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William H. Cook, FAIA | 1924 – 2009

2018-08-16

Mastering Design for Living by the Cook Family...

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TUCSON, AZ 85717

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Historic U.S. 80

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U.S. 80 is one of the most historic routes traveling through Arizona. The roots of the road date back to the late 1846 and the first roads through Arizona Territory. Beginning in Yuma, the road followed the Gila River to Buckeye and Phoenix, then traveled east through the Valley to reach Florence Junction, then south to Florence. From there, the road headed southeast to Tucson, east to Benson, southeast to Bisbee and Douglas, and northeast to Lordsburg, NM.

Cooke's Wagon Road was improved from the original U.S. Army Gila Trail, deviating from the Gila River route through eastern Arizona in search of gentler terrain. The road was named after Captain Philip St. George Cooke, who constructed the route for the Mormon Battalion's supply wagons. The general route of Cooke's road became the East-West Territorial Road by 1909 (between Yuma and Phoenix), and the North-South Territorial Road from Phoenix to Douglas via Tucson. In 1914, the Ocean to Ocean Highway bridge was constructed in Yuma from Bureau of Indian Affairs funds.

By 1922, the route of U.S. 80 was known as the Bankhead Highway, and the Old Spanish Trail by 1923. In 1925, U.S. 80 was included in the Federal 7% system of highways for Arizona, and denoted as U.S. 80.

Between 1916 and 1924, U.S. 80 was realigned to more closely follow the Southern Pacific Railroad tracks between Dome and Buckeye. Prior to realignment, the road stayed on the north side of the river, but was prone to washouts as it traversed the mountains. The last piece of this project was the 1928 Gillespie Bridge, passing just south of Gillespie Dam over the Gila River.

In 1920, the first sections of U.S. 80 in Phoenix were paved in concrete, marking the first paved road in Arizona. By 1928, the section through Telegraph Pass was constructed, and paved by 1931.

In 1932, the Mule Pass section of U.S. 80 was reconstructed and paved. The Mill Avenue Bridge (in Tempe) opened in 1931, followed by Cienaga Creek east of Tucson in 1934 and the Stone Avenue (Tucson) railroad underpass in 1936.

By 1939, the entire highway was paved, except for the section between Florence and Oracle Junction. This became somewhat controversial, and the entire highway was paved by 1945, after reconstruction of some segments between the two cities.

In 1948, Telegraph Pass was reconstructed completely. In 1952, the new Mule Pass Tunnel opened, the longest one in Arizona. In 1956, the Gillespie Bridge was bypassed with a new high speed alignment east of the Gila River, and the Cienaga Creek bridge was bypassed with a new four lane expressway.

With the completion of Arizona 84 in 1930 and Arizona 86 in 1939, U.S. 80 became a secondary highway, as many thru travelers took those state highways as shortcuts to eliminate some of the extra distance traversed by U.S. 80.

With the advent of the Interstate system, Interstate 8 was planned to overlay U.S. 80 from Yuma to Gila Bend. Interstate 10 was planned to overlay U.S. 80 from Tucson to Benson. U.S. 80 remained an extant highway until 1977, when it was decommissioned from Yuma to Benson.

Between Wellton and Mohawk, U.S. 80 was never multiplexed with Interstate 8. Arizona 85 replaced U.S. 80 between Gila Bend and Phoenix.

In 1989, the remainder of U.S. 80 was decommissioned in Arizona. This remaining section was renumbered to Arizona 80.



For additional photos of the Ocean to Ocean Highway Bridge, see Historic U.S. 80 (California). For additional photos between Benson and Douglas, see the Arizona 80 page.

Old U.S. 80 - Gila Bend and Buckeye



This owl points the way to old U.S. 80 just outside Gila Bend. This marks the beginning of the 1924 alignment that was bypassed in 1956. Photo taken 07/15/07.



Old U.S. 80 meets Watermelon Road here. Photo taken 07/15/07.



This bridge over Rainbow Wash has seen better days. Photo taken 07/15/07.



The Rainbow Wash bridge was washed out many years ago. Today, the road travels through the wash. Photo taken 07/15/07.



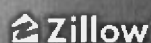
The Gillespie Bridge was completed in 1928. This two lane steel truss bridge replaced the original 1921 crossing of the Gila River (which crossed along Gillespie Dam). Photo taken 07/15/07.



Gillespie Dam was constructed in 1921 for flood control and water storage, but washed out in 1993 in a large flood. The dam has not been rebuilt. Photo taken 07/15/07.



This is an overview of the Gillespie bridge from the hillside above the bridge and dam. Photo taken 07/15/07.



Know what your
home is worth
today and a
year from now.



Historic U.S. 80 at Arlington School Road, in Arlington north of the dam. Photo taken 07/15/07.



This is a typical panorama along Historic U.S. 80 between Arlington and Arizona 85. Photo taken 07/15/07.

Historic U.S. 80 does not meet Arizona 85 directly anymore. Travellers must follow Hazen Road to Arizona 85. Photo taken 07/15/07.



Directional signage to Arizona 85. Photo taken 07/15/07.

Photo Credits:

07/15/07 by Kevin Trinkle

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Arizona 80 / Historic U.S. 80

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U.S. Route 80 in Arizona

U.S. Route 80 (**US 80**) also known as the **Ocean-to-Ocean Highway**, the **Broadway of America** and the **Jefferson Davis Highway** was a major transcontinental highway which existed in the U.S. state of Arizona from November 11, 1926, to October 6, 1989. At its peak, US 80 traveled from the California border in Yuma to the New Mexico state line near Lordsburg. US 80 was an important highway in the development of Arizona's car culture. Like its northern counterpart, US 66, the popularity of travel along US 80 helped lead to the establishment of many unique road side businesses and attractions, including many iconic motor hotels and restaurants.

US 80 was a particularly long highway, reaching a length of almost 500 miles (800 km) within the state of Arizona alone. With the advent of the Interstate Highway System, Interstate 10 and Interstate 8 both replaced US 80 within the state. US 80 was removed from Arizona in 1989; the remainder of it now being State Route 80. In September 2018, the Arizona Department of Transportation designated former segments of the highway as **Historic U.S. Route 80**.

Contents

Route description

History

- Background
- National Highway Status
- End Of An Era
- Historic Route 80

Major intersections

Structures and attractions

See also

References

External links

Route description

On its journey across Arizona, US 80 made two indirect loops to both Phoenix and Douglas. Both loops were bypassed by travelers, using SR 84 and SR 86 respectively to decrease travel time between



U.S. Route 80

Ocean-to-Ocean Highway
Broadway of America

Wikimedia | © OpenStreetMap

1951 alignment of US 80 highlighted in red

Route information

Maintained by ADOT

Length 497.67 mi^{[1][2]} (800.92 km)

Mileage reflects US 80 as it was in 1951.

Existed November 11, 1926–

October 6, 1989

History Western terminus at I-10 in Benson after 1977

Tourist routes Historic U.S. Route 80

Major intersections (In 1951)

West end US 80 in Yuma

SR 95 in Yuma

SR 84 / SR 85 in Gila Bend

US 60 / US 70 / US 89 from Phoenix to Florence Junction

SR 87 in Mesa

California and New Mexico.^[3] The odd shape created by the two "loops" gave US 80 a long length through the state of Arizona, coming close to 500 miles (800 km) in total. In 1934, US 80 was 500.5 miles (805.5 km) long.^[4] By 1951, the total length had reduced to about 498 miles (801 km), shrinking further to 488 miles (785 km) in 1956 with the bypass of Arlington.^{[1][5]}



Allen Street (former US 80) in Tombstone






US 80 entered Arizona from New Mexico on current New Mexico State Road 80 and Arizona State Route 80 near Rodeo. US 80 wound southwest into Douglas intersecting with US 666 (now US 191). From Douglas, US 80 ran northwest, then north through Lowell, Bisbee, Tombstone and St. David meeting up with SR 86 in Benson.^{[1][5][6]} The route between New Mexico and Benson has been subject to change. Prior to the construction of the Mule Pass Tunnel in 1952, US 80 used Main Street and North Old Divide Road through Bisbee. Through Tombstone, US 80 once used Allen Street (which is now a pedestrian mall). Many older gradual curves and alignments of US 80 are visible between Douglas and Benson, some of which are still driveable. Originally, US 80 entered Benson on what is now Catarina Street and Gila Street, before later being switched to the route currently followed by SR 80. US 80 met with SR 86 (now I-10 Business) at a grade separated interchange in downtown Benson, where the latter highway ended (until picking up again at US 89 in Tucson). Much of US 80 to Tucson has since been overlaid by Interstate 10 with a few exceptions. Near Exit 302, an old gradual curve of US 80 constitutes as Titan Drive. Older US 80 followed Marsh Station Road between I-10 exits 289 and 281 until the early 1950s. US 80 followed the north Frontage road past Exit 281 before merging back into the routing of I-10.^[6]




1939 Stone Avenue underpass in Tucson

In Tucson, US 80 left I-10's routing and headed west along Benson Highway, briefly merging back into I-10's routing to meet US 89 and SR 84 at 6th Avenue.^{[7][8]} US 80, US 89 and SR 84 headed north through Tucson on 6th Avenue, Stone Avenue, Drachman Street and Oracle Boulevard (now Oracle Road). SR 84 split off heading west to Casa Grande at Casa Grande Highway (now West Miracle Mile).^[8] US 80 and US 89 continued north along present day SR 77 and SR 79 through Florence. The older route in Florence took the SR 79 business route, Main Street and Ruggles Street through town. US 80/US 89 met up with US 60/70 at Florence Junction, where all four highways headed west towards Phoenix. Modern US 60 still travels this route. The original

Florence Junction lies north of the current one. From this point, the earliest routings of US 60, US 80 and US 89 used El Camino Viejo, an old gravel road, before re-joining modern US 60 west of Florence. The latter alignment used modern US

-  US 89 from Florence Junction to Tucson
-  SR 287 in Florence
-  SR 84 in Tucson
-  SR 86 in Benson
-  US 666 in Douglas

East end  US 80 at the New Mexico state line

Location

Counties Yuma, Maricopa, Pinal, Pima, Cochise

Highway system

United States Numbered Highway System

List · Special · Divided · Replaced

Arizona Highways

Interstate · U.S. · State (Unconstructed · Former)

←  SR 79 SR 80  →

60. At Apache Junction, Old US 60/US 70/US 80/US 89 continued heading northwest onto Old West Highway where present day US 60 turns west onto the Superstition Freeway, then turned west onto East Apache Trail at the intersection with SR 88.^[6]

The four highways continued heading west on Apache Trail/Main Street through Mesa into Tempe, where the concurrent routes turned north onto Mill Avenue, crossed the Salt River then curved west onto Van Buren Street into Phoenix. At the intersection with Grand Avenue, US 60, US 70 and US 89 left US 80 heading northwest to Wickenburg.^[5] US 80 continued west on Van Buren, then turned south onto 17th Avenue, passing in front of the Arizona State Capitol then turned west onto Buckeye Road. US 80 headed west through Avondale, Goodyear and Buckeye using Buckeye Road, MC 85 and Baseline Road. US 80 turned south at the junction with SR 85.^[6]



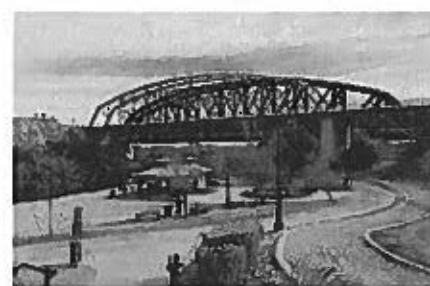
Arizona State Capitol in Phoenix



1927 Gillespie Dam Bridge.

The final route of US 80 took SR 85 south to Gila Bend, while the older route, which was bypassed in 1951, took an "S" shape further west following the Gila River, crossing it at one point over a 1927 bridge south of the Gillespie Dam.^{[1][5]} The older route is known today as "Old US 80 Highway" and is only accessible from SR 85 via Hazen Road and Wilson Road. US 80 met SR 84 again in Gila Bend, where it curved west through town on the Interstate 8 Business Loop, then followed what is now the I-8 south Frontage Road before being subsumed into I-8. The old route of US 80 breaks away from time to time and appears within the freeway median. Around Exit 78, US 80 curved briefly onto the North Frontage Road, passed in front of a Texaco station (now abandoned) then took the south Frontage Road through Dateland. West of Dateland, US 80 became the present day eastbound lanes of Interstate 8 before breaking off again at Exit 54 under the guise of Old Highway 80 through Mohawk Pass along with the hamlets of Owl and Tacna before passing through the town of Wellton. Between Mohawk Pass and Telegraph Pass, there are a few older incarnations of US 80 which deviate from the main route. Some of these older routings are no longer maintained.^[6]

West of Wellton, post 1928 US 80 followed present day I-8 through the Telegraph Pass (part of which can be seen around the point where the eastbound and westbound lanes of I-8 switch over) to the I-8 Business Loop, while the earlier route followed Avenue 20 E from Ligurta to a Gravel Road following the Union Pacific Railroad through the ghost town of Dome then southwest along present day US 95 and an abandoned road parallel to the railroad where it met up with the later route in Yuma. US 80 travelled through town along the I-8 Business Loop, turning north, crossing an intersection with US 95 to the Colorado River. The older route used the 1914 Ocean-to-Ocean Bridge, which was bypassed in 1956 to cross the Colorado River, while the later alignment continued straight ahead into California. Upon crossing the Colorado River to the Fort Yuma Indian Reservation, the older route was still in Arizona. Unlike most of the California and Arizona state border which resides along the Colorado River, the border temporarily cuts north here through the Reservation then east back to the Colorado. This places several acres of land on the western side of the river in Arizona. For a few hundred feet, the state border runs along the western shoulder of pre-1956 US 80. A short distance north of the bridge, the highway curved left, crossing into California and arriving at a now abandoned Agricultural Inspection Station before continuing west towards San Diego.^[6]



The 1914 Ocean-to-Ocean Bridge in Yuma

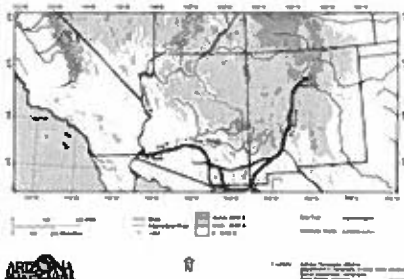
West of Wellton, post 1928 US 80 followed present day I-8 through the Telegraph Pass (part of which can be seen around the point where the eastbound and westbound lanes of I-8 switch over) to the I-8 Business Loop, while the earlier route followed Avenue 20 E from Ligurta to a Gravel Road following the Union Pacific Railroad through the ghost town of Dome then southwest along present day US 95 and an abandoned road parallel to the railroad where it met up with the later route in Yuma. US 80 travelled through town along the I-8 Business Loop, turning north, crossing an intersection with US 95 to the Colorado River. The older route used the 1914 Ocean-to-Ocean Bridge, which was bypassed in 1956 to cross the Colorado River, while the later alignment continued straight ahead into California. Upon crossing the Colorado River to the Fort Yuma Indian Reservation, the older route was still in Arizona. Unlike most of the California and Arizona state border which resides along the Colorado River, the border temporarily cuts north here through the Reservation then east back to the Colorado. This places several acres of land on the western side of the river in Arizona. For a few hundred feet, the state border runs along the western shoulder of pre-1956 US 80. A short distance north of the bridge, the highway curved left, crossing into California and arriving at a now abandoned Agricultural Inspection Station before continuing west towards San Diego.^[6]

History

US 80 had a profound effect on Arizona's economic development and car culture, much like US 66 had done in the northern part of the state.^[9] Along its route, US 80 passed by many natural and historic landmarks, which are of cultural importance to the state of Arizona. The history and background surrounding Arizona's section of US 80 dates back to pre-Columbian Native American culture and society.^{[10][11]}

Background

The Gila Trail

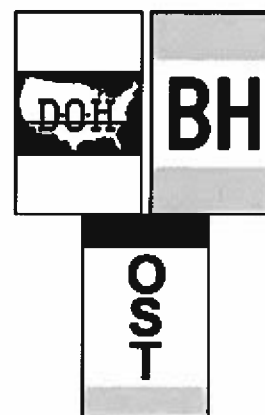


Map of the Gila Trail. The ancestor of US 80.

The general path of the Gila Trail in Arizona was traversed by Native Americans for thousands of years. The first non-Native person to travel the Gila Trail was a Spanish owned African slave named Esteban, who had been brought to North America in 1527 as part of the colonization of Florida by Charles V of Spain. In 1538, Esteban accompanied a Franciscan friar by the name of Marcos de Niza on a quest, which included travelling along the Gila Trail.^{[11][12]} Father Eusebio Kino utilized the Gila Trail to establish missions across present day southern Arizona and California.^[13] In 1821, southern Arizona had become part of Mexico.^[14] The first Americans on the trail were 19th Century fur trappers, who made use of the nearby Gila River's beaver population. During the Mexican-American War Lieutenant General Stephen W. Kearney of the United States Army sent his Army of the West over the Gila

Trail.^[15] Following the Mexican-American War, the Treaty of Guadalupe Hidalgo in 1848 and the Gadsden Purchase in 1853, the land surrounding the Gila Trail became part of the United States and was organized as New Mexico Territory in 1850.^{[16][17]} After 1848, Gila Trail had become a popular and heavily traveled wagon route to California. By this time it was now known as Cooke's Wagon Road. The new name was in reference to Captain Philip St. George Cooke, leader of the Mormon Battalion, whom had used the road shortly after General Kearny.^[18] In 1863, the western part of New Mexico Territory was re-established as Arizona Territory.^{[14][16]}

By 1909, Cooke's Wagon Road had become the East-West Territorial Road and North-South Territorial Road respectively. The former route travelled between Yuma and Phoenix while the latter travelled between Phoenix, Tucson and Douglas.^[19] In February 1912, Arizona was accepted into the union as a state.^{[14][16]} Using funding from the Bureau of Indian Affairs, the Ocean-to-Ocean bridge was constructed between Winterhaven, California, and Yuma in 1914.^[20] Between 1917 and 1919, the Dixie Overland Highway was established from Savannah, Georgia, to San Diego, California, becoming the first Auto trail to be designated over what would later be U.S. Route 80.^[21] From Yuma to New Mexico, the Dixie Overland Highway followed the basic route of US 80 in Arizona very closely.^[6] This was joined by the Bankhead Highway in 1920 and the Old Spanish Trail in 1923.^{[22][21][6]} In 1919 and 1920, the auto routes between Dome and Buckeye suffered extensive damage from flooding. This was due to the three routes being located on the Gila River floodplain. The Arizona Highway Department decided to construct a new southern route following the Southern Pacific Railroad more closely through Gila Bend. The new route was completed in 1922.^[23] Up through 1924, the Bankhead Highway, Dixie Overland Highway and Old Spanish Trail still followed the older route.^[24] By the next year, the



Markers for the Dixie Overland Highway, Bankhead Highway and Old Spanish Trail

trio had been realigned to the newer alignment and paving of the routes was also taking place.^[25] In the eastern part of the state, the Arizona Highway Department with the assistance of federal financial aid as well as financial aid from both Pima and Cochise counties, constructed the concrete arch Ciénega Bridge east of Tucson between 1920 and 1921.^[26]

National Highway Status



US 80 sign from 1926 to 1956



Directional colored US 80 shields found in Arizona during the 1950s. The brown signs stood for eastbound with blue standing for westbound.

In April 1925, the Joint Board on Interstate Highways, was appointed by the Secretary of Agriculture to simplify the transcontinental highways. The joint board proposed a new nationwide numbered highway system. The new highways were to follow a uniform standard of shields and numbering. This system was to become the U.S. Numbered Highway System. By October 1925, a proposed route under the numeric designation "80" was proposed along a similar path to the Dixie Overland Highway, Old Spanish Trail and Bankhead Highway. On November 11, 1926, the American Association of State Highway Officials (AASHO) approved of the new system, which included US 80 between Savannah, Georgia and San Diego, California.^{[21][27]} Despite the new U.S.

Highway designation, the Dixie Overland Highway, Bankhead Highway and Old Spanish Trail designations would continue into the early 1930s.^[28]

In 1927, a steel truss bridge was constructed over the Gila River next to the Gillespie Dam. Prior to the construction of the bridge, traffic utilized a concrete apron constructed at the foot of the dam to cross the river. At the time, it was the largest steel structure in the state of Arizona. The bridge was added to the National Register of Historic Places on May 5, 1981.^[29] In 1928, the section of US 80 through Telegraph Pass was constructed and would be paved by 1930.^{[30][31]} US 80 became part of the Broadway of America auto trail in 1930.



US 80 through Maricopa County in 1940.

The Broadway of America followed US 80 between Yuma and Phoenix as well as between Tucson and the New Mexico border. The rest of the Broadway of America in Arizona consisted of SR 87 and SR 84 between Tucson and Phoenix via Casa Grande.^[6] In 1931, the Mill Street Bridge in Tempe was constructed to carry US 80 and US 89 across the Salt River.^[32] The Mill Avenue bridge replaced the earlier 1913 Ash Avenue Bridge, which had carried both highways between Phoenix and Tempe since 1926.^[6] Reconstruction and paving on the section through Mule Pass near Bisbee occurred in 1932. The Stone Avenue railroad underpass in Tucson was completed in 1936.^[26] By 1935, most of US 80 was paved within the state of Arizona, save for a small section between Florence and Oracle Junction.^[33] In 1936, the state of Arizona allocated over \$6 Million in federal funds for a statewide highway improvement. Much of this funding was allocated to the entirety of US 80 in Arizona, for constructing and rebuilding alignments and bridges as well as improving water drainage along the highway.^[34] Further aid on US 80 was supplied by the Works Progress Administration, which provided the state with the labor force to reconstruct the highway in the late 1930s.^[35] In 1936, real estate developer Stanley Williamson laid out a proposal to rebuild a large section of US 80 and US 89 north of downtown Tucson, as well as a small segment of SR 84 into a thriving commercial district, similar to the Miracle Mile in Los Angeles, California. Originally, the glorified roadway along the three highways was to be named "Parkway Boulevard" but Williamson decided instead to call the proposed district Miracle Mile after its inspiration.^[36] These plans also called for a section of US 80 and US 89 between Drachman Street and SR 84 to be reconstructed. Known as Oracle Road, the section of road was rebuilt a four lane divided

highway to handle larger traffic volumes and promote business growth as well as further highway improvements. The rebuild would also include two large traffic circles at either end of the four lane section with SR 84 and Drachman Street. Reconstruction of Oracle Road (US 80 and US 89) was awarded to the Tanner Construction Company in 1937 and completed within the same year. Not long after construction, motels began appearing along the new Miracle Mile, marking the beginning of what would become a successful business district.^[37] By 1946, the section of US 80 between Florence Junction and Oracle Junction was finally reconstructed and paved. The completion of the 1946 project meant every section of US 80 in Arizona was now fully paved.^[38]



Postcard of the El Cortez Motel on US 80 in Yuma.

On April 15, 1947, a group of US 80 proponents met at the Pioneer Hotel in downtown Tucson to discuss the improvement of tourism on US 80 through the American southwest. The small group had studied tourism statistics along the route following the end of the Second World War. The findings concluded tourism on US 80 had exponentially decreased since the 1930s. In response, the proponents voted to form a California, Arizona and New Mexico division of the U.S. Highway 80 Association to better promote US 80 to cross country tourists.^[39] In June 1949, the western division of the U.S. Highway 80 Association was formally established with Tucson chosen as its headquarters. The division committed itself to publishing thousands of informational booklets, strip maps and pay for roadside advertisements all in an effort to promote the highway. Membership was also offered to local businesses on the route between San Diego and El Paso, Texas.^[40] In the following years, the highway's popularity increased dramatically. During the 1950s, more motorists traveled on US 80 between Arizona and California than on the famous US 66.^[3] Approximately 2,500 cars travelled on US 80 each day by the middle of the decade. Arizona's five largest cities of the time were also located along the highway.^[41] Like its northern counterpart, US 80 also featured many iconic road side businesses and attractions, which included Boothill Cemetery and the O.K. Corral in Tombstone, Stoval's Space Age Lodge in Gila Bend, Yuma Territorial Prison, the Geronimo Surrender Monument near Douglas and the Painted Rock Petroglyph Site. Rows of iconic neon signed motels aligned US 80 in the many towns and cities it passed through, including Tucson's Miracle Mile. High demand for motel rooms by U.S. Army personnel and the postwar population boom in Tucson resulted in an explosive growth of hotel and restaurant construction on Miracle Mile and Benson Highway southeast of downtown.^[37] As of 2016, many of these attractions and structures have been listed on the National Register of Historic Places.^[10] The Mule Pass Tunnel was constructed in 1952, becoming the longest tunnel in Arizona.^[6] Two straighter and faster alignments of US 80 were constructed in 1956, bypassing the Gillespie Dam area and Cienega Creek.^[5] The January 1956 issue of Arizona Highways magazine was partially dedicated to the state's section of US 80.^[41] In 1961, the Arizona Highway Commission voted to designate the entirety of US 80 in Arizona as part of the Jefferson Davis Highway.^[42]

End Of An Era

Following the creation of the Interstate Highway System in 1957,^[43] Interstate 10 and Interstate 8 were both slated to replace US 80.^[44] In 1948, the Arizona Highway Department approved construction of the Tucson Controlled Access Highway, a freeway bypass around the core of Tucson. This would become one of the first sections of I-10. Though a state highway, initial construction of the bypass was funded by a 1948 city bond issue passed by the city of Tucson.^{[45][37]} The new bypass originally ran between Congress Street and Miracle Mile. At first, this bypass lacked overpasses and interchanges between Grant Road and Speedway Boulevard.^[37] The new bypass was extended eastward by 1956 to an interchange with US 80 and US 89 at 6th Avenue and Benson Highway.^[5] By November, the bypass was signed SR 84A.^[46] Construction started in 1958 to rebuild SR 84A to Interstate standards.^[37] In 1957, work began on a section of Benson Highway (US 80) southeast of Tucson to upgrade the road into a four lane divided highway. Of the 7.25 miles (11.67 kilometres) of upgraded road, 4.25 mi (6.84 km) were slated to become part of I-10 and be built to full interstate

standards. The segment became the first federally funded Interstate Highway construction project in Arizona.^[47] This section was completed by December 1960.^[48] The new section of I-10 had full freeway interchanges and frontage roads at Craycroft Road and Wilmot Road with a third planned later for Valencia Road.^{[48][47]} Other sections of US 80 and SR 86 east of Tucson were also being upgraded into new sections of I-10, with a total of four freeway interchanges between Tucson and Benson complete.^[48] Other sections were rebuilt into a four lane divided highway around 1958.^[49] I-10 west of 6th Avenue and Benson Highway up to Flowing Wells was completed by 1961, with a sections north of Tucson through Marana well under construction.^[37]



Decayed neon sign for the Linger Longer Court in Tucson. This US 80 motel fell into decline after the Interstate bypass and was torn down.

By 1963 construction was under way on rebuilding sections of US 80 and SR 84 between Casa Grande and Yuma into I-8 as well as parts of SR 84 between Picacho and Casa Grande into I-10.^[50] Most of I-8 through Arizona was completed by 1971 as well as most of I-10 in the southeastern part of the state. Most of US 80 had been fully rebuilt into I-8 between Blaisdell and Gila Bend, save for a standalone section between Ligurta and Mohawk. In the eastern part of Arizona, I-10 had been completed between 6th Avenue and Valencia Road as well as taking over all of US 80 between Valencia Road and 4th Street in Benson. Both Interstates were complete between Gila Bend and Tucson, replacing or bypassing almost all of SR 84. Between Benson and the New Mexico state line near San Simon, former SR 86 had been rebuilt into I-10 and decommissioned.^[51]

With new Interstate Highways taking its place as the main routes, US 80 was becoming obsolete.^[21] Motorists were bypassing business districts on the Interstates. Motels along US 80, such as the ones along Miracle Mile in Tucson, saw a sharp decline in popularity. Many motels went out of business and were torn down, while others had to face growing crime rates within the neighborhoods the businesses were located in.^[37] The growing obsolescence of the highway also caused the western states to view the US 80 designation as redundant. Between 1964 and 1969, California retired its section of US 80 in favor of I-8, effectively moving the western end of US 80 to the California state line in Yuma.^[21] In 1977, Arizona requested a truncation of US 80 to Benson. The American Association of State Highway and Transportation Officials (AASHTO) approved the request, decommissioning all of US 80 between Yuma and Benson as of October 28 of that year.^[21] Part of the section of US 80 between Gila Bend and Phoenix became an extension of SR 85.^[52] In 1989, both Arizona and New Mexico requested the elimination of US 80 in both states. The request was approved by AASHTO on October 6.^[21] The remaining section of US 80 in Arizona was subsequently downgraded to SR 80.^[53] A former section of US 80 between Buckeye and Phoenix, signed as SR 85 at the time, was still used by Interstate traffic through Phoenix until I-10 completed construction through Phoenix in 1990.^{[54][52]} A few sections of old US 80 throughout Arizona pay homage to the retired highway in their names, such as Old U.S. Highway 80 between Gila Bend and Buckeye.^[6]

Historic Route 80

In 2012, the Tucson Historic Preservation Foundation (also known as the THPF) embarked on preliminary work needed to apply for a state historic designation of US 80 in Arizona. The foundation commenced survey and mapping work on old sections of the route the same year.^[55] Over \$100,000 was spent by the THPF to initiate the historic designation process.^[3] Further research by the THPF utilized essays written for the Arizona Department of Transportation and Federal Highway Administration as well as a US 80 driving guide written by Jeff Jensen. Further resources were obtained through the special collections of the University of Arizona and Arizona Historical Society. Findings by the THPF concluded at least 40 separate segments of former US 80 in Arizona survive un-interrupted.^[3] In July 2016, the THPF finished all necessary preparation work for a historic designation and submitted a formal application for the Historic US 80 designation to the ADOT Parkways, Historic and Scenic Roads Advisory Committee.^[55] The proposal included several



US 80 is an Arizona state designated Historic Road.

attached letters of support from various historical committees, mayors and city council members of several towns which the designation would affect.^[10]

During a meeting on June 20, 2017, the Parkways, Historic and Scenic Roads Advisory Committee decided to unanimously recommend the Historic Route 80 designation to the Arizona State Transportation Board.^[55] By August 2018, ADOT was close to completing required reports for the Arizona State Transportation Board needed to sign and designate the segments of Historic US 80 that are part of the state








The historic Tucson Inn motor hotel as it looked in 1956. The Tucson Inn along with most of Tucson's Miracle Mile was added to the National Register of Historic Places in 2017.






highway system. ADOT is also working with respective local governing bodies to sign and designate the segments that are no longer part of the state highway system.^[3] On September 21, 2018, all preparation work was complete and the ADOT Parkways, Historic and Scenic Roads Advisory Committee officially adopted US 80 as a state designated Historic Road.^[56] The Historic Route designation connects to and supplements Historic Route 80 in California.^[55] Historic US 80 is the fourth state designated Historic Route in Arizona, joining Historic Route 66, the Jerome-Clarkdale-Cottonwood Historic Road (Historic US 89A) and the Apache Trail Historic Road.^[57]

In parallel with the Historic Route 80 designation project, the City of Tucson submitted an application to add a segment of former US 80, known as Miracle Mile, to the National Register of Historic Places in Summer 2016.^[55] On December 11, 2017 the application was approved and the segment added to the NRHP became known as the Miracle Mile Historic District. The Historic District includes part of Stone Avenue, Drachman Street, the southern segment of Oracle Road, West Miracle Mile (former SR 84) and a small two block section of Main Avenue south of the intersection of Oracle and Drachman. The Miracle Mile Historic District also includes over 281 man made structures including historic motor hotels among other roadside attractions and local businesses.^[58]

Major intersections

This list follows the 1951 alignment.

County	Location	mi [1][2]	km	Destinations [8][59][6][60]	Notes
<u>Colorado River</u>		0.00	0.00	 <u>US 80 west – San Diego</u>	California state line
		0.04	0.064	<u>Ocean To Ocean Bridge</u>	
<u>Yuma</u>	<u>Yuma</u>	2.63	4.23	 <u>SR 95 (16th Street) – Quartzsite, San Luis</u>	Now US 95
<u>Maricopa</u>	<u>Gila Bend</u>	119.15	191.75	 <u>SR 85 south (Martin Avenue) – Ajo</u>	Northern terminus of SR 85
		120.06	193.22	 <u>SR 84 east (Pima Street) – Casa Grande</u>	Western terminus of SR 84; SR 84 bypassed the US 80 Phoenix "Loop"; now I-8 Bus. east
	<u>Gila River</u>	142.37	229.12	<u>Gillespie Dam Bridge</u>	
	<u>Phoenix</u>	194.64	313.24	   <u>US 60 / US 70 west / US 89 north (Grand Avenue) / 7th Avenue – Wickenburg</u>	Western terminus of concurrency with US 60/US 70/US 89
	<u>Tempe</u>	202.77	326.33	<u>Washington Street west – Phoenix</u>	Interchange; now Center Parkway
		203.32	327.21	<u>Mill Avenue Bridge over the Salt River</u>	
	<u>Mesa</u>	210.46	338.70	 <u>SR 87 south (Country Club Drive) – Chandler, Casa Grande</u>	Northern terminus of SR 87
<u>Pinal</u>	<u>Apache Junction</u>	227.14	365.55	 <u>SR 88 north (Apache Trail) – Globe</u>	Western terminus of SR 88
		243.54	391.94	  <u>US 60 / US 70 east – Globe</u>	Eastern terminus of concurrency with US 60/US 70
	<u>Florence</u>	258.00	415.21	<u>Bridge over the Gila River</u>	
		260.91	419.89	 <u>SR 287 west – Coolidge</u>	Eastern terminus of SR 287
	<u>Oracle Junction</u>	302.90	487.47	 <u>SR 77 east – Oracle</u>	Southern terminus of SR 77
<u>Pima</u>	<u>Tucson</u>	321.98	518.18	<u>Bridge over El Rillito</u>	
		324.30	521.91	 <u>SR 84 west (Casa Grande Highway) – Marana, Casa Grande</u>	Northern traffic circle on Oracle Boulevard; western terminus of concurrency with SR 84; now SR 77 south
		329.74	530.67	   <u>US 89 south (6th Avenue) / SR 84 end to SR 86 west – Sahuarita, Nogales, Ajo</u>	Eastern terminus of concurrency with US 89/SR 84; eastern terminus of SR 84 ^[7]
	<u>Vail</u>	350.69	564.38	 <u>SR 83 south – Sonoita</u>	Northern terminus of SR 83
	<u>Cienega Creek</u>	353.51	568.92	<u>Ciénega Bridge</u>	
<u>Cochise</u>	<u>Benson</u>	375.83	604.84	 <u>SR 86 east (4th Street) – Willcox</u>	Western terminus of SR 86 eastern segment; SR 86 along with <u>SR 14</u> in New

					Mexico bypassed the US 80 "Loop" to Douglas; now I-10 Bus. east
<u>Tombstone</u>	396.51	638.12	 SR 82 west – Fairbank		Eastern terminus of SR 82
	415.19	668.18	 SR 90 west		Eastern terminus of SR 90
<u>Lowell</u>	426.01	685.60	 SR 92 west		Eastern terminus of SR 92
<u>Douglas</u>	446.92	719.25	 US 666 north – Willcox		Southern terminus of US 666; now US 191 north
	497.67	800.92	 US 80 east – Rodeo		New Mexico state line
1.000 mi = 1.609 km; 1.000 km = 0.621 mi					

Structures and attractions

The following is an incomplete list of notable attractions and structures along old US 80 in Arizona:^{[10][41]}

- Ocean To Ocean Bridge, Yuma
- Ruins of Dome, Arizona
- The Space Age Lodge, Gila Bend, built in 1962 and currently owned and run by Best Western^[61]
- Gillespie Dam, Gila Bend
- Gillespie Dam Bridge, Gila Bend, 1927 bridge across the Gila River next to the Gillespie Dam^[29]
- Agua Caliente, Arizona
- Horseshoe Cafe, Benson, 1940s cafe^[62]
- Arizona State Capitol, Phoenix
- Tucson Inn, Tucson, part of the Miracle Mile Historic District^[58]
- Ciénega Bridge, Historic concrete arch bridge in Pima County^[26]
- O.K. Corral and C.S. Fly's Photo Gallery, Tombstone, site of the infamous gunfight between the Wyatt Earp, Virgil Earp, Morgan Earp and Doc Holliday against the Clantons^[63]
- Queen Mine, Bisbee, a copper mine opened in the late 19th century and ceased mining operations in 1975 that is open for public tours^[64]
- Gadsden Hotel, Douglas
- Geronimo Surrender Monument, Douglas



C.S. Fly's Photo Gallery in Tombstone

See also

- Arizona State Route 80
- U.S. Route 66 in Arizona
- U.S. Route 80
- U.S. Route 180

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External links

-  Geographic data related to **U.S. Route 80 in Arizona circa 1951** (<https://www.openstreetmap.org/relation/2808849>) at OpenStreetMap
- **U.S. Highway 80** at American Roads (<http://www.americanroads.us/ushighways/ushighway80.html>)
- **Bygone Byways** (<http://home.comcast.net/~bygonebyways/>) – Includes several resources related to US 80 in Arizona
- **January 1956 Issue of Arizona Highways** (<https://azmemory.azlibrary.gov/digital/collection/aho/id/740/rec/11>) – Featuring US 80
- **Old Spanish Trail Centennial** – historical re-enactment <http://www.olds spanish trail centennial.com/home.html>

80 U.S. Route 80		
Previous state: California	Arizona	Next state: New Mexico

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3 July 2019

John S. Halikowski, Director
Arizona Department of Transportation
1655 W. Jackson Street, MD 126F
Phoenix, AZ 85007

Re: I11 ADOT Study – Proposed Route

Dear Director Halikowski:

I am writing to object to the current proposed I-11 route. I request that one of the alternate routes be considered for the following reasons:

- The current proposed route will do the most harm to a farming community that was settled in 1888. There are descendants of the settlers that still live and farm in the Palo Verde, Arizona area. See [Exhibit A](#).¹
- It will displace many, many people from their homes, farming businesses and lands. Not to mention the people who will lose their jobs who work for the farmers that will be displaced due to the loss of farm lands and agricultural businesses (dairies, etc.).
- It will destroy approximately 3,000 acres of private, cultivated farm land and affect many farmers economic viability. Destroying viable agricultural land at a time when the population is growing (from 4.4B in 1980 to 9.6B+ in 2050) and agricultural lands are taken out of production due to urbanization (from 1 acre per person in 1961 to 1/3 acre per person in 2050). See [Exhibit B-1: The Work Bank Group, "Enabling the Business of Agriculture 2015 – Progress Report"](#)²; [Exhibit B-2: The Climate Corporation: Turning Data Into Insight for Farmers](#).³
- It will cost the American taxpayer billions more in tax dollars to build. The alternate routes (especially the Orange Route) will cost less as the roadways have already been acquired years ago.
- We have been told that even if the current proposed route is the one chosen, it will not be built for 15-20 years but in the State of Arizona it is a Full Disclosure State. Basically, those of us who are in the current proposed route will not be able to sell our property as we would have to disclose there would be an Interstate to run through our properties. Our properties will be devalued as we will not be able to sell our properties even if we had to sell

¹ Wikipedia: Palo Verde, Arizona; last edited on 30 April 2018, at 23:26 (UTC).

² The World Bank Group: "Enabling the Business of Agriculture 2015 – Progress Report." Figure 1.1: The global population is expected to exceed 9 billion by 2050; Pages 1-2.

³ The Climate Corporation: Turning Data Into Insight for Farmers; Martin Rand, CEO, VitalFields; "Global: Crop Production Demand Climbing." Declining arable land: 1 acre per person in 1961 to 1/3 acre per person in 2050.

due to death or other circumstances. Those of us have worked our whole lives for our homes and lands to just have the government come and take it all away from us when there are alternative routes that will not affect as many people and their lands and businesses.

- It will ruin the tax basis for the Palo Verde School District with all the private lands removed and put a tax burden on those private property owners that are left. The Palo Verde School will be destroyed as it is in the path of the current proposed route so there will also be a burden to rebuild somewhere.
- It will destroy the Historical Old Highway 80 that was designated an Arizona Historic Highway on September 21, 2018 by an unanimous vote of the Arizona State Transportation Board.⁴

I respectfully request that the current proposed I-11 route be abandoned and one of the alternate routes (preferably the Orange Route) be approved.

Sincerely,



Melanie Aja Lanford

MAL:ww

Enclosures

PC: President of the United States, Donald Trump
Governor of Arizona, Doug Ducey
Senator Martha McSally
Senator Kirsten Sinema
Congressman Tom O'Halleran, AZ 1st District
Congresswoman Ann Kirkpatrick, AZ 2nd District
Congressman Raul Grijalva, AZ 3rd District
Congressman Paul Gosar, AZ 4th District
Congressman Andy Biggs, AZ 5th District
Congressman David Schweikert, AZ 6th District
Congressman Ruben Gallegos, AZ 7th District
Congresswoman Debbie Lesko, AZ 8th District
Congressman Greg Stanton, AZ 9th District
Arizona Senator Sine Kerr, 13th Legislative District
Secretary of Transportation, Elaine L. Chao
Federal Highway Administrator, Nicole R. Nason
I-11 ADOT Tier 1 EIS Study Team

⁴ Tucson Historic Preservation Foundation 2019 – Historic Arizona U.S. Route 80 Designation, William H. Cook, FAIA, 1924-2009, 2018-08-16 and AA Roads; Historic U.S. 80, Page Updated 11-09-2007.

EXHIBIT A

Wikipedia: Palo Verde, Arizona

WIKIPEDIA

Palo Verde, Arizona

Palo Verde is a small populated place in Maricopa County, Arizona, United States. It is located about 40 miles west of Phoenix, and 6 miles southwest of downtown Buckeye.

Brief history

The Palo Verde area was settled in 1886, by John G. Roberts and family. Mr. Roberts helped in the construction of the Arizona and Buckeye canals, served a term as cattle inspector, and was deputy sheriff at Buckeye under three Maricopa County sheriffs.^{[1][2]} One of the first structures built, which still stands today, was the Palo Verde Baptist Church, organized in 1890.^[3]

Despite sharing a name, the Palo Verde Nuclear Generating Station is located in nearby Wintersburg.

Palo Verde exists as a county island within the planning boundary of Buckeye. This precludes any possibility of incorporation for the community, but annexation into Buckeye is a possibility.

In 1995, a train derailment occurred near the town of Palo Verde.



The **Palo Verde Cemetery** was established in 1903 and is located on 29600 West Old Hwy. 80.

References

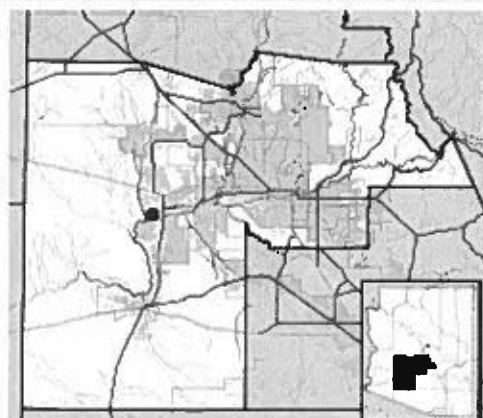
- "Wickenburg Sun Obituaries"; July 30, 1954; page 5]
- Arizona Obituary Archive (<http://obits.arizonagravestones.org/view.php?id=1640>)
- Early History of Buckeye (<http://buckeye4locals.com/history/the-early-days-of-buckeye-az/>)

Palo Verde, Arizona

Populated place



The **Palo Verde Baptist Church** was built in 1890 and is located on 29600 West Old Hwy. 80.



Location in Maricopa County and the state of Arizona

Coordinates: 33°20′53″N 112°40′39″W﻿ / ﻿33.34806°N 112.67750°W﻿ / 33.34806; -112.67750

Country	United States
State	Arizona
County	Maricopa
Elevation	845 ft (258 m)
Time zone	UTC-7 (Mountain (MST))



Grave of John G. Roberts (1874-1954),
founder of Palo verde

Retrieved from "https://en.wikipedia.org/w/index.php?title=Palo_Verde,_Arizona&oldid=839053372"

This page was last edited on 30 April 2018, at 23:36 (UTC).

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EXHIBIT B-1

The World Bank Group

Introduction

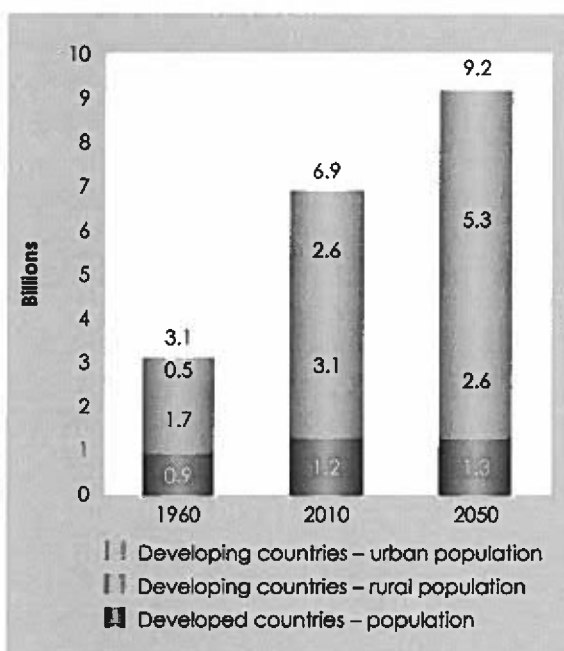
By 2050 the world's population is projected to exceed 9 billion (figure 1.1).¹ Global food demand will increase by an estimated 63%,² propelled not only by the expected population growth but also by an ongoing evolution of diets worldwide. A steady growth in kilocalories per capita is expected at the global level, along with rising consumption of resource-intensive commodities—higher value crops, animal protein and processed foods—driven by the

increasing affluence and richer diets of urbanizing populations in developing regions.

The growth of urban centers in the developing world is a fundamental part of the story. As the population of these areas swells and more people see gains in income and in access to food choices, demand will grow for a range of agricultural products. At the same time, urban markets will need to provide staple foods at sensible prices for the growing numbers of poor people who will live near them. Indeed, the expected growth in global food demand will be driven largely, if not exclusively, by growth in urban food demand in developing regions. This demand is projected to nearly double in 40 years—increasing by an estimated 78%, far more than the modest total increase expected in developed regions. In Sub-Saharan Africa, for example, growth in urban food demand during this period could exceed 300%, and in India, 200%.

While demand for more and better food is growing, supply is increasingly fragile. It is well recognized that crop production is very sensitive to climate change,³ making food provision in the next decades especially challenging. Climate change by 2050 could reduce crop yields by an average of 17%, when compared with a scenario with unchanging climate, and lead to an increase of 20% in crop prices.⁴ The tropics—where many developing countries are located—will be hit hardest by rising temperatures, less rainfall and higher sea levels. Impacts

FIGURE 1.1: The global population is expected to exceed 9 billion by 2050



Source: United Nations 2009.

are likely to be most severe in countries with high transportation costs, where adapted varieties are unavailable and, based on global nitrogen availability simulations, where nitrogen fertilizer use is low.⁵ In highly vulnerable regions, where incomes are meager and most rural households depend on agriculture for their food and livelihoods, more people will face hunger as a result of climate change.⁶

Add water and land scarcity to this scenario. An increasing number of countries are reaching alarming levels of water scarcity; 1.4 billion people live in areas with sinking ground water levels.⁷ Water scarcity is particularly pronounced in the Middle East, North Africa and South Asia regions and is likely to worsen as a result of climate change in many regions. Burgeoning populations mean more demand for land at a time when large parts of all continents are experiencing land degradation, resulting in water and wind erosion, loss of organic matter, topsoil compaction, salinization and soil pollution, and nutrient loss. Other countries are extremely land-scarce, and much of the potential land is suitable for growing crops that are not in high demand. To produce the food and other agricultural products that the future's population will demand, more productive and sustainable use of limited, highly demanded natural resources needs to be ensured across the entire agricultural production chain.

Nations need to be prepared to address this compelling prospect. The growing demand for food calls for enhancing agricultural output, efficiency, and distribution, all while advancing sustainability and making the agribusiness sector more inclusive. Increasing food production in the face of deteriorating soils, scarce natural resources and climate change is, in itself, an enormous challenge. To this must be added the need to connect producers and the urban market over increasing distances. Postharvest

processes—encompassing transport, standards implementation, food safety and market knowledge—will become increasingly critical to a successful market process for agricultural products. The required food supply increase can be achieved if the necessary investments are made and adequate regulations and policies are put in place.⁸

Efforts to meet growing food demand cannot be separated from the ongoing battle to eradicate poverty, particularly in rural areas. Agriculture-led growth offers an unusually powerful vehicle for a broad reduction of poverty.⁹ The agribusiness dimension of rural development—particularly in agricultural marketing and agroprocessing—often prove critical to successful agricultural growth.¹⁰ Without well-functioning agricultural markets, farm productivity gains lead to temporary production surges and price collapses. Better access to markets is needed to maintain production incentives and permit households to specialize and enable them to move to high-value products and value-added activities.

A pivotal role for smaller-scale producers

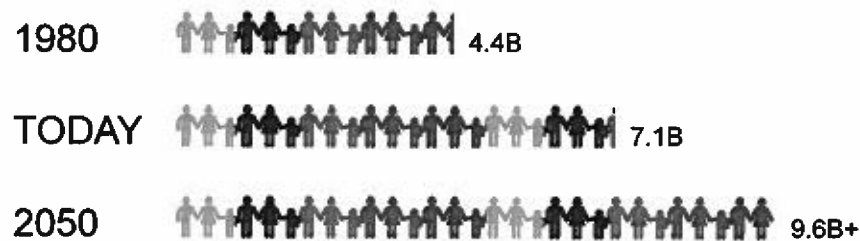
Smaller-scale producers can play a pivotal role in increasing food production and availability, as they command large areas of land, especially in developing countries, where they provide most of the food supply. Up to 70% of the population in many countries of Asia and Sub-Saharan Africa form part of smallholder farm households, both consuming the food they produce and selling their marketable surplus. In the European Union, 70% of the almost 12 million farms are less than 5 hectares. Globally, smallholder farms are estimated to number around 500 million, typically ranging between 0.5 and 10 hectares in size and averaging less than 2 hectares.

EXHIBIT B-2

The Climate Corporation

Global: Crop Production Demand Climbing

RISING *population*



Source: <http://esa.un.org/unpd/wpp>

GROWING *middle class*



Source: <http://www.reuters.com/middle-class-infographic>

RISING *animal protein consumption*



Source: UN FAO Food Balance Sheet, World Health Organization Global and regional food consumption patterns and trends*

DECLINING *arable land*



Source: The World Bank, Food and Agriculture Organization of the United Nations (FAO-STAT), Monsanto Internal Calculations

EXHIBIT C
Historic Arizona
U.S. Route 80 Designation

TUCSON HISTORIC PRESERVATION
FOUNDATION

Historic Arizona U.S. Route 80 Designation

On September 21, 2018, the historic alignment of Arizona U.S. Route 80 was designated a Historic Arizona Road by a unanimous vote of the Arizona State Transportation Board. Since 2012 the Tucson Historic Preservation Foundation worked to designate the old route across the state of Arizona from Yuma to Douglas.

Beginning in 2012 the Tucson Historic Preservation Foundation began the inventory, survey and mapping of the historic alignment of U.S. Route 80. (1926 – 1977) across the State of Arizona from the New Mexico border through Douglas, Bisbee, Benson, Tucson, Florence, Apache Junction, Mesa, Tempe, Phoenix, Buckeye, Gila Bend and Yuma into California. In Tucson, the alignment follows Oracle Road, Drachmann, Stone Avenue, South Sixth Avenue and Benson Highway and is an important historic corridor that represents the transformation and development of Tucson in the 20th Century. In summer 2016 the City of Tucson submitted the National Register of Historic Places nomination for the Miracle Mile Historic District (the northern segment of this highway in Tucson).

TUCSON HISTORIC PRESERVATION
FOUNDATION

resource. Like Route 66 to the north, the Arizona segment of US 80 shaped the west. Along its curb developed roadside architecture: service stations, diners, attractions, neon-signs, motels and a host of other resources wove into communities and through rural vistas combining to create a distinct and unique sense of place.

The Arizona Department of Transportation Parkways, Historic and Scenic Roads Advisory Committee met on June 20, 2017 and unanimously recommended Designation of the Historic Arizona US Route 80. The Arizona Transportation Board voted to designate the Route on September 21, 2018.

TUCSON HISTORIC PRESERVATION FOUNDATION

In July of 2016 the Tucson Historic Preservation Foundation submitted the application to initiate the designation of Historic Arizona U.S. Route 80 to the Arizona Department of Transportation Parkways, Historic and Scenic Roads Advisory Committee for consideration.

The Arizona, U.S. Route 80, Historic Highway application was prepared by the Tucson Historic Preservation Foundation and was developed through numerous site and corridor surveys and with mapping support from Tyler Theriot and Desert Archeology, INC. The application utilized the superb work of Jeff Jensen's publication and detailed guide "Drive the Broadway of America! The U.S. 80 and Bankhead Highway across the American Southwest" and Good Roads Everywhere: A History of Road Building in Arizona prepared for the ADOT Environmental Planning Section by Melissa Keane and J. Simon Bruder and includes the suburb national context essay: U.S. Route 80 The Dixie Overland Highway by Richard F. Weingroff of the Federal Highway Administration. In addition to the available secondary sources, primary research was undertaken at University of Arizona special collections, Arizona Historical Society research library and extensive field research along the route.

The application documents the historic resources connected by Arizona U.S. Route 80 and identifies the intrinsic qualities that define the Arizona U.S. Route 80 experience. The application provides a historic context that tracks the early highway development connecting with extant physical resources including: sites, objects, buildings, structures, monuments and districts along the way. The Designation of Arizona Historic US Route 80 connects to the designation of Historic US Route 80 by the California Department of Transportation and similar designation efforts in Texas and in the south.

DOWNLOADABLE RESOURCES

ARIZONA HISTORIC US ROUTE 80 APPLICATION SUBMITTED TO ADOT JULY 2016

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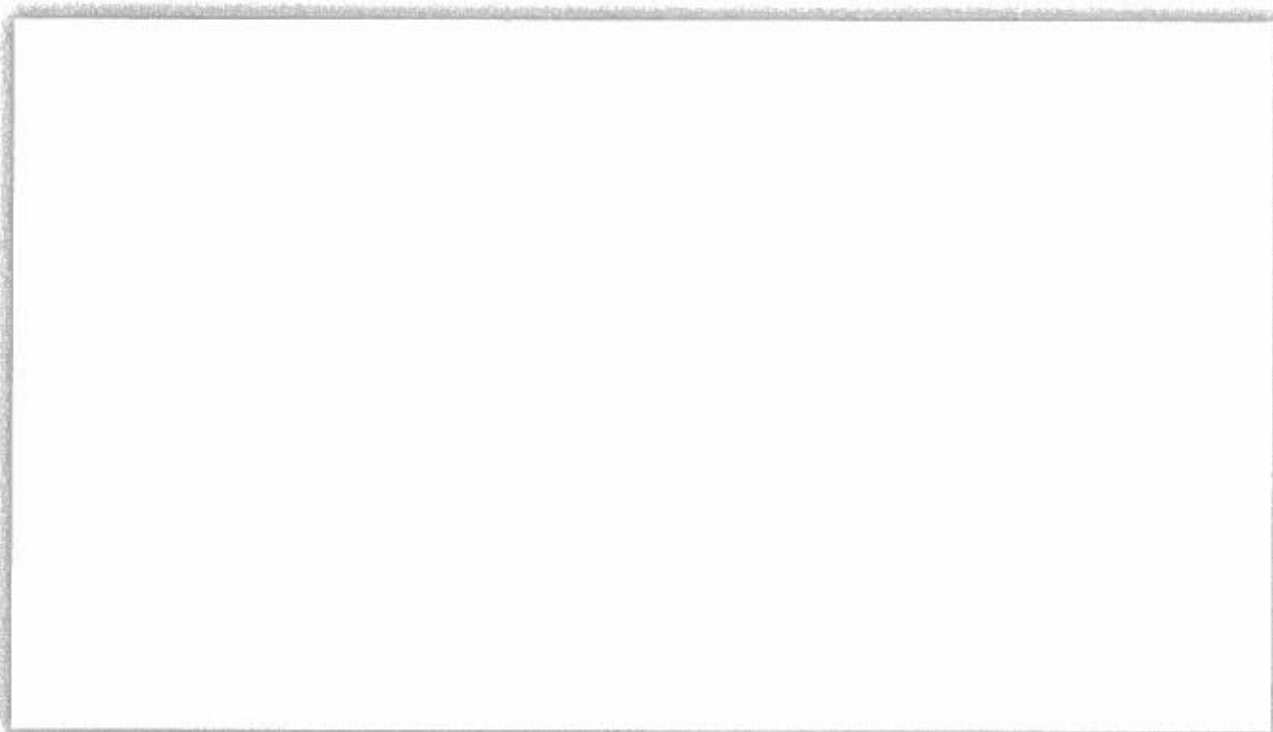
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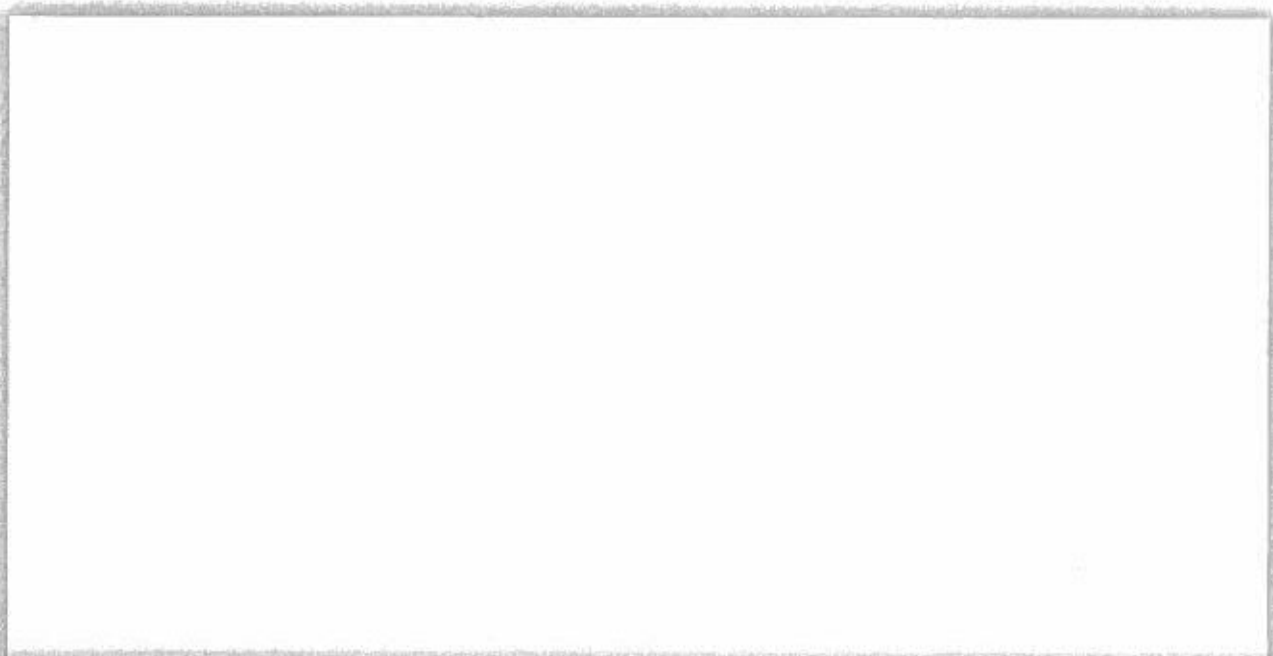


Harwood Steiger

2019-04-28

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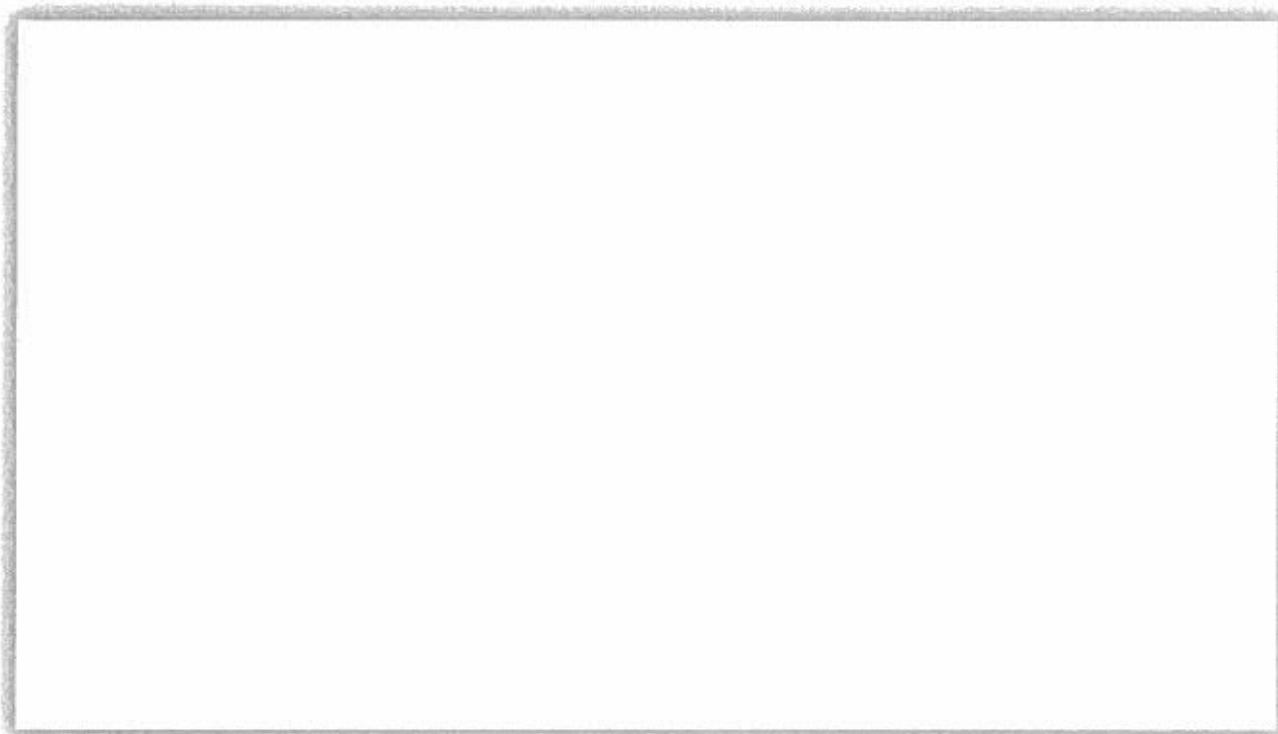
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Historic U.S. 80

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U.S. 80 is one of the most historic routes traveling through Arizona. The roots of the road date back to the late 1846 and the first roads through Arizona Territory. Beginning in Yuma, the road followed the Gila River to Buckeye and Phoenix, then traveled east through the Valley to reach Florence Junction, then south to Florence. From there, the road headed southeast to Tucson, east to Benson, southeast to Bisbee and Douglas, and northeast to Lordsburg, NM.

Cooke's Wagon Road was improved from the original U.S. Army Gila Trail, deviating from the Gila River route through eastern Arizona in search of gentler terrain. The road was named after Captain Philip St. George Cooke, who constructed the route for the Mormon Battalion's supply wagons. The general route of Cooke's road became the East-West Territorial Road by 1909 (between Yuma and Phoenix), and the North-South Territorial Road from Phoenix to Douglas via Tucson. In 1914, the Ocean to Ocean Highway bridge was constructed in Yuma from Bureau of Indian Affairs funds.

By 1922, the route of U.S. 80 was known as the Bankhead Highway, and the Old Spanish Trail by 1923. In 1925, U.S. 80 was included in the Federal 7% system of highways for Arizona, and denoted as U.S. 80.

Between 1916 and 1924, U.S. 80 was realigned to more closely follow the Southern Pacific Railroad tracks between Dome and Buckeye. Prior to realignment, the road stayed on the north side of the river, but was prone to washouts as it traversed the mountains. The last piece of this project was the 1928 Gillespie Bridge, passing just south of Gillespie Dam over the Gila River.

In 1920, the first sections of U.S. 80 in Phoenix were paved in concrete, marking the first paved road in Arizona. By 1928, the section through Telegraph Pass was constructed, and paved by 1931.

In 1932, the Mule Pass section of U.S. 80 was reconstructed and paved. The Mill Avenue Bridge (in Tempe) opened in 1931, followed by Cienaga Creek east of Tucson in 1934 and the Stone Avenue (Tucson) railroad underpass in 1936.

By 1939, the entire highway was paved, except for the section between Florence and Oracle Junction. This became somewhat controversial, and the entire highway was paved by 1945, after reconstruction of some segments between the two cities.

In 1948, Telegraph Pass was reconstructed completely. In 1952, the new Mule Pass Tunnel opened, the longest one in Arizona. In 1956, the Gillespie Bridge was bypassed with a new high speed alignment east of the Gila River, and the Cienaga Creek bridge was bypassed with a new four lane expressway.

With the completion of Arizona 84 in 1930 and Arizona 86 in 1939, U.S. 80 became a secondary highway, as many thru travelers took those state highways as shortcuts to eliminate some of the extra distance traversed by U.S. 80.

With the advent of the Interstate system, Interstate 8 was planned to overlay U.S. 80 from Yuma to Gila Bend. Interstate 10 was planned to overlay U.S. 80 from Tucson to Benson. U.S. 80 remained an extant highway until 1977, when it was decommissioned from Yuma to Benson.

Between Wellton and Mohawk, U.S. 80 was never multiplexed with Interstate 8. Arizona 85 replaced U.S. 80 between Gila Bend and Phoenix.

In 1989, the remainder of U.S. 80 was decommissioned in Arizona. This remaining section was renumbered to Arizona 80.



For additional photos of the Ocean to Ocean Highway Bridge, see Historic U.S. 80 (California). For additional photos between Benson and Douglas, see the Arizona 80 page.

Old U.S. 80 - Gila Bend and Buckeye



This owl points the way to old U.S. 80 just outside Gila Bend. This marks the beginning of the 1924 alignment that was bypassed in 1956. Photo taken 07/15/07.



Old U.S. 80 meets Watermelon Road here. Photo taken 07/15/07.



This bridge over Rainbow Wash has seen better days. Photo taken 07/15/07.



The Rainbow Wash bridge was washed out many years ago. Today, the road travels through the wash. Photo taken 07/15/07.



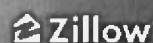
The Gillespie Bridge was completed in 1928. This two lane steel truss bridge replaced the original 1921 crossing of the Gila River (which crossed along Gillespie Dam). Photo taken 07/15/07.



Gillespie Dam was constructed in 1921 for flood control and water storage, but washed out in 1993 in a large flood. The dam has not been rebuilt. Photo taken 07/15/07.



This is an overview of the Gillespie bridge from the hillside above the bridge and dam. Photo taken 07/15/07.



Know what your
home is worth
today and a
year from now.



Historic U.S. 80 at Arlington School Road, in Arlington north of the dam. Photo taken 07/15/07.



This is a typical panorama along Historic U.S. 80 between Arlington and Arizona 85. Photo taken 07/15/07.

Historic U.S. 80 does not meet Arizona 85 directly anymore. Travellers must follow Hazen Road to Arizona 85. Photo taken 07/15/07.



Directional signage to Arizona 85. Photo taken 07/15/07.

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U.S. Route 80 in Arizona

U.S. Route 80 (**US 80**) also known as the **Ocean-to-Ocean Highway**, the **Broadway of America** and the **Jefferson Davis Highway** was a major transcontinental highway which existed in the U.S. state of Arizona from November 11, 1926, to October 6, 1989. At its peak, US 80 traveled from the California border in Yuma to the New Mexico state line near Lordsburg. US 80 was an important highway in the development of Arizona's car culture. Like its northern counterpart, US 66, the popularity of travel along US 80 helped lead to the establishment of many unique road side businesses and attractions, including many iconic motor hotels and restaurants.

US 80 was a particularly long highway, reaching a length of almost 500 miles (800 km) within the state of Arizona alone. With the advent of the Interstate Highway System, Interstate 10 and Interstate 8 both replaced US 80 within the state. US 80 was removed from Arizona in 1989; the remainder of it now being State Route 80. In September 2018, the Arizona Department of Transportation designated former segments of the highway as **Historic U.S. Route 80**.

Contents

Route description

History

- Background
- National Highway Status
- End Of An Era
- Historic Route 80

Major intersections

Structures and attractions

See also

References

External links

Route description

On its journey across Arizona, US 80 made two indirect loops to both Phoenix and Douglas. Both loops were bypassed by travelers, using SR 84 and SR 86 respectively to decrease travel time between



U.S. Route 80

Ocean-to-Ocean Highway
Broadway of America

Wikimedia | OpenStreetMap

1951 alignment of US 80 highlighted in red

Route information

Maintained by ADOT

Length 497.67 mi^{[1][2]} (800.92 km)

Mileage reflects US 80 as it was in 1951.

Existed November 11, 1926–

October 6, 1989

History Western terminus at I-10 in Benson after 1977

Tourist routes Historic U.S. Route 80

Major intersections (In 1951)

West end US 80 in Yuma

- SR 95 in Yuma
- SR 84 / SR 85 in Gila Bend
- US 60 / US 70 / US 89 from Phoenix to Florence Junction
- SR 87 in Mesa

California and New Mexico.^[3] The odd shape created by the two "loops" gave US 80 a long length through the state of Arizona, coming close to 500 miles (800 km) in total. In 1934, US 80 was 500.5 miles (805.5 km) long.^[4] By 1951, the total length had reduced to about 498 miles (801 km), shrinking further to 488 miles (785 km) in 1956 with the bypass of Arlington.^{[1][5]}



Allen Street (former US 80) in Tombstone






US 80 entered Arizona from New Mexico on current New Mexico State Road 80 and Arizona State Route 80 near Rodeo. US 80 wound southwest into Douglas intersecting with US 666 (now US 191). From Douglas, US 80 ran northwest, then north through Lowell, Bisbee, Tombstone and St. David meeting up with SR 86 in Benson.^{[1][5][6]} The route between New Mexico and Benson has been subject to change. Prior to the construction of the Mule Pass Tunnel in 1952, US 80 used Main Street and North Old Divide Road through Bisbee. Through Tombstone, US 80 once used Allen Street (which is now a pedestrian mall). Many older gradual curves and alignments of US 80 are visible between Douglas and Benson, some of which are still driveable. Originally, US 80 entered Benson on what is now Catarina Street and Gila Street, before later being switched to the route currently followed by SR 80. US 80 met with SR 86 (now I-10 Business) at a grade separated interchange in downtown Benson, where the latter highway ended (until picking up again at US 89 in Tucson). Much of US 80 to Tucson has since been overlaid by Interstate 10 with a few exceptions. Near Exit 302, an old gradual curve of US 80 constitutes as Titan Drive. Older US 80 followed Marsh Station Road between I-10 exits 289 and 281 until the early 1950s. US 80 followed the north Frontage road past Exit 281 before merging back into the routing of I-10.^[6]




1939 Stone Avenue underpass in Tucson

In Tucson, US 80 left I-10's routing and headed west along Benson Highway, briefly merging back into I-10's routing to meet US 89 and SR 84 at 6th Avenue.^{[7][8]} US 80, US 89 and SR 84 headed north through Tucson on 6th Avenue, Stone Avenue, Drachman Street and Oracle Boulevard (now Oracle Road). SR 84 split off heading west to Casa Grande at Casa Grande Highway (now West Miracle Mile).^[8] US 80 and US 89 continued north along present day SR 77 and SR 79 through Florence. The older route in Florence took the SR 79 business route, Main Street and Ruggles Street through town. US 80/US 89 met up with US 60/70 at Florence Junction, where all four highways headed west towards Phoenix. Modern US 60 still travels this route. The original

Florence Junction lies north of the current one. From this point, the earliest routings of US 60, US 80 and US 89 used El Camino Viejo, an old gravel road, before re-joining modern US 60 west of Florence. The latter alignment used modern US

-  US 89 from Florence Junction to Tucson
-  SR 287 in Florence
-  SR 84 in Tucson
-  SR 86 in Benson
-  US 666 in Douglas

East end  US 80 at the New Mexico state line

Location

Counties Yuma, Maricopa, Pinal, Pima, Cochise

Highway system

United States Numbered Highway System

List · Special · Divided · Replaced

Arizona Highways

Interstate · U.S. · State (Unconstructed · Former)

←  SR 79 SR 80  →

60. At Apache Junction, Old US 60/US 70/US 80/US 89 continued heading northwest onto Old West Highway where present day US 60 turns west onto the Superstition Freeway, then turned west onto East Apache Trail at the intersection with SR 88.^[6]

The four highways continued heading west on Apache Trail/Main Street through Mesa into Tempe, where the concurrent routes turned north onto Mill Avenue, crossed the Salt River then curved west onto Van Buren Street into Phoenix. At the intersection with Grand Avenue, US 60, US 70 and US 89 left US 80 heading northwest to Wickenburg.^[5] US 80 continued west on Van Buren, then turned south onto 17th Avenue, passing in front of the Arizona State Capitol then turned west onto Buckeye Road. US 80 headed west through Avondale, Goodyear and Buckeye using Buckeye Road, MC 85 and Baseline Road. US 80 turned south at the junction with SR 85.^[6]



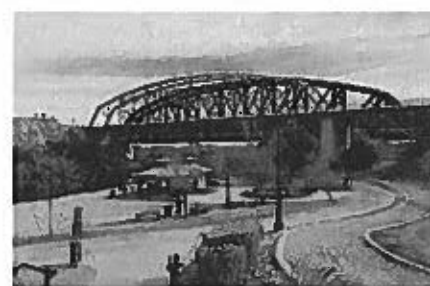
Arizona State Capitol in Phoenix



1927 Gillespie Dam Bridge.

The final route of US 80 took SR 85 south to Gila Bend, while the older route, which was bypassed in 1951, took an "S" shape further west following the Gila River, crossing it at one point over a 1927 bridge south of the Gillespie Dam.^{[1][5]} The older route is known today as "Old US 80 Highway" and is only accessible from SR 85 via Hazen Road and Wilson Road. US 80 met SR 84 again in Gila Bend, where it curved west through town on the Interstate 8 Business Loop, then followed what is now the I-8 south Frontage Road before being subsumed into I-8. The old route of US 80 breaks away from time to time and appears within the freeway median. Around Exit 78, US 80 curved briefly onto the North Frontage Road, passed in front of a Texaco station (now abandoned) then took the south Frontage Road through Dateland. West of Dateland, US 80 became the present day eastbound lanes of Interstate 8 before breaking off again at Exit 54 under the guise of Old Highway 80 through Mohawk Pass along with the hamlets of Owl and Tacna before passing through the town of Wellton. Between Mohawk Pass and Telegraph Pass, there are a few older incarnations of US 80 which deviate from the main route. Some of these older routings are no longer maintained.^[6]

West of Wellton, post 1928 US 80 followed present day I-8 through the Telegraph Pass (part of which can be seen around the point where the eastbound and westbound lanes of I-8 switch over) to the I-8 Business Loop, while the earlier route followed Avenue 20 E from Ligurta to a Gravel Road following the Union Pacific Railroad through the ghost town of Dome then southwest along present day US 95 and an abandoned road parallel to the railroad where it met up with the later route in Yuma. US 80 travelled through town along the I-8 Business Loop, turning north, crossing an intersection with US 95 to the Colorado River. The older route used the 1914 Ocean-to-Ocean Bridge, which was bypassed in 1956 to cross the Colorado River, while the later alignment continued straight ahead into California. Upon crossing the Colorado River to the Fort Yuma Indian Reservation, the older route was still in Arizona. Unlike most of the California and Arizona state border which resides along the Colorado River, the border temporarily cuts north here through the Reservation then east back to the Colorado. This places several acres of land on the western side of the river in Arizona. For a few hundred feet, the state border runs along the western shoulder of pre-1956 US 80. A short distance north of the bridge, the highway curved left, crossing into California and arriving at a now abandoned Agricultural Inspection Station before continuing west towards San Diego.^[6]



The 1914 Ocean-to-Ocean Bridge in Yuma

West of Wellton, post 1928 US 80 followed present day I-8 through the Telegraph Pass (part of which can be seen around the point where the eastbound and westbound lanes of I-8 switch over) to the I-8 Business Loop, while the earlier route followed Avenue 20 E from Ligurta to a Gravel Road following the Union Pacific Railroad through the ghost town of Dome then southwest along present day US 95 and an abandoned road parallel to the railroad where it met up with the later route in Yuma. US 80 travelled through town along the I-8 Business Loop, turning north, crossing an intersection with US 95 to the Colorado River. The older route used the 1914 Ocean-to-Ocean Bridge, which was bypassed in 1956 to cross the Colorado River, while the later alignment continued straight ahead into California. Upon crossing the Colorado River to the Fort Yuma Indian Reservation, the older route was still in Arizona. Unlike most of the California and Arizona state border which resides along the Colorado River, the border temporarily cuts north here through the Reservation then east back to the Colorado. This places several acres of land on the western side of the river in Arizona. For a few hundred feet, the state border runs along the western shoulder of pre-1956 US 80. A short distance north of the bridge, the highway curved left, crossing into California and arriving at a now abandoned Agricultural Inspection Station before continuing west towards San Diego.^[6]

History

US 80 had a profound effect on Arizona's economic development and car culture, much like US 66 had done in the northern part of the state.^[9] Along its route, US 80 passed by many natural and historic landmarks, which are of cultural importance to the state of Arizona. The history and background surrounding Arizona's section of US 80 dates back to pre-Columbian Native American culture and society.^{[10][11]}

Background

The Gila Trail

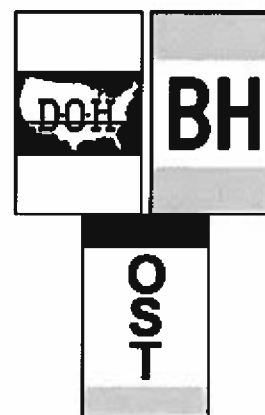


Map of the Gila Trail. The ancestor of US 80.

The general path of the Gila Trail in Arizona was traversed by Native Americans for thousands of years. The first non-Native person to travel the Gila Trail was a Spanish owned African slave named Esteban, who had been brought to North America in 1527 as part of the colonization of Florida by Charles V of Spain. In 1538, Esteban accompanied a Franciscan friar by the name of Marcos de Niza on a quest, which included travelling along the Gila Trail.^{[11][12]} Father Eusebio Kino utilized the Gila Trail to establish missions across present day southern Arizona and California.^[13] In 1821, southern Arizona had become part of Mexico.^[14] The first Americans on the trail were 19th Century fur trappers, who made use of the nearby Gila River's beaver population. During the Mexican-American War Lieutenant General Stephen W. Kearney of the United States Army sent his Army of the West over the Gila

Trail.^[15] Following the Mexican-American War, the Treaty of Guadalupe Hidalgo in 1848 and the Gadsden Purchase in 1853, the land surrounding the Gila Trail became part of the United States and was organized as New Mexico Territory in 1850.^{[16][17]} After 1848, Gila Trail had become a popular and heavily traveled wagon route to California. By this time it was now known as Cooke's Wagon Road. The new name was in reference to Captain Philip St. George Cooke, leader of the Mormon Battalion, whom had used the road shortly after General Kearny.^[18] In 1863, the western part of New Mexico Territory was re-established as Arizona Territory.^{[14][16]}

By 1909, Cooke's Wagon Road had become the East-West Territorial Road and North-South Territorial Road respectively. The former route travelled between Yuma and Phoenix while the latter travelled between Phoenix, Tucson and Douglas.^[19] In February 1912, Arizona was accepted into the union as a state.^{[14][16]} Using funding from the Bureau of Indian Affairs, the Ocean-to-Ocean bridge was constructed between Winterhaven, California, and Yuma in 1914.^[20] Between 1917 and 1919, the Dixie Overland Highway was established from Savannah, Georgia, to San Diego, California, becoming the first Auto trail to be designated over what would later be U.S. Route 80.^[21] From Yuma to New Mexico, the Dixie Overland Highway followed the basic route of US 80 in Arizona very closely.^[6] This was joined by the Bankhead Highway in 1920 and the Old Spanish Trail in 1923.^{[22][21][6]} In 1919 and 1920, the auto routes between Dome and Buckeye suffered extensive damage from flooding. This was due to the three routes being located on the Gila River floodplain. The Arizona Highway Department decided to construct a new southern route following the Southern Pacific Railroad more closely through Gila Bend. The new route was completed in 1922.^[23] Up through 1924, the Bankhead Highway, Dixie Overland Highway and Old Spanish Trail still followed the older route.^[24] By the next year, the



Markers for the Dixie Overland Highway, Bankhead Highway and Old Spanish Trail

trio had been realigned to the newer alignment and paving of the routes was also taking place.^[25] In the eastern part of the state, the Arizona Highway Department with the assistance of federal financial aid as well as financial aid from both Pima and Cochise counties, constructed the concrete arch Ciénega Bridge east of Tucson between 1920 and 1921.^[26]

National Highway Status



US 80 sign from
1926 to 1956



Directional colored US 80
shields found in Arizona during
the 1950s. The brown signs
stood for eastbound with blue
standing for westbound.

In April 1925, the Joint Board on Interstate Highways, was appointed by the Secretary of Agriculture to simplify the transcontinental highways. The joint board proposed a new nationwide numbered highway system. The new highways were to follow a uniform standard of shields and numbering. This system was to become the U.S. Numbered Highway System. By October 1925, a proposed route under the numeric designation "80" was proposed along a similar path to the Dixie Overland Highway, Old Spanish Trail and Bankhead Highway. On November 11, 1926, the American Association of State Highway Officials (AASHO) approved of the new system, which included US 80 between Savannah, Georgia and San Diego, California.^{[21][27]} Despite the new U.S.

Highway designation, the Dixie Overland Highway, Bankhead Highway and Old Spanish Trail designations would continue into the early 1930s.^[28]

In 1927, a steel truss bridge was constructed over the Gila River next to the Gillespie Dam. Prior to the construction of the bridge, traffic utilized a concrete apron constructed at the foot of the dam to cross the river. At the time, it was the largest steel structure in the state of Arizona. The bridge was added to the National Register of Historic Places on May 5, 1981.^[29] In 1928, the section of US 80 through Telegraph Pass was constructed and would be paved by 1930.^{[30][31]} US 80 became part of the Broadway of America auto trail in 1930.



US 80 through Maricopa County in
1940.

The Broadway of America followed US 80 between Yuma and Phoenix as well as between Tucson and the New Mexico border. The rest of the Broadway of America in Arizona consisted of SR 87 and SR 84 between Tucson and Phoenix via Casa Grande.^[6] In 1931, the Mill Street Bridge in Tempe was constructed to carry US 80 and US 89 across the Salt River.^[32] The Mill Avenue bridge replaced the earlier 1913 Ash Avenue Bridge, which had carried both highways between Phoenix and Tempe since 1926.^[6] Reconstruction and paving on the section through Mule Pass near Bisbee occurred in 1932. The Stone Avenue railroad underpass in Tucson was completed in 1936.^[26] By 1935, most of US 80 was paved within the state of Arizona, save for a small section between Florence and Oracle Junction.^[33] In 1936, the state of Arizona allocated over \$6 Million in federal funds for a statewide highway improvement. Much of this funding was allocated to the entirety of US 80 in Arizona, for constructing and rebuilding alignments and bridges as well as improving water drainage along the highway.^[34] Further aid on US 80 was supplied by the Works Progress Administration, which provided the state with the labor force to reconstruct the highway in the late 1930s.^[35] In 1936, real estate developer Stanley Williamson laid out a proposal to rebuild a large section of US 80 and US 89 north of downtown Tucson, as well as a small segment of SR 84 into a thriving commercial district, similar to the Miracle Mile in Los Angeles, California. Originally, the glorified roadway along the three highways was to be named "Parkway Boulevard" but Williamson decided instead to call the proposed district Miracle Mile after its inspiration.^[36] These plans also called for a section of US 80 and US 89 between Drachman Street and SR 84 to be reconstructed. Known as Oracle Road, the section of road was rebuilt a four lane divided

highway to handle larger traffic volumes and promote business growth as well as further highway improvements. The rebuild would also include two large traffic circles at either end of the four lane section with SR 84 and Drachman Street. Reconstruction of Oracle Road (US 80 and US 89) was awarded to the Tanner Construction Company in 1937 and completed within the same year. Not long after construction, motels began appearing along the new Miracle Mile, marking the beginning of what would become a successful business district.^[37] By 1946, the section of US 80 between Florence Junction and Oracle Junction was finally reconstructed and paved. The completion of the 1946 project meant every section of US 80 in Arizona was now fully paved.^[38]



Postcard of the El Cortez Motel on US 80 in Yuma.

On April 15, 1947, a group of US 80 proponents met at the Pioneer Hotel in downtown Tucson to discuss the improvement of tourism on US 80 through the American southwest. The small group had studied tourism statistics along the route following the end of the Second World War. The findings concluded tourism on US 80 had exponentially decreased since the 1930s. In response, the proponents voted to form a California, Arizona and New Mexico division of the U.S. Highway 80 Association to better promote US 80 to cross country tourists.^[39] In June 1949, the western division of the U.S. Highway 80 Association was formally established with Tucson chosen as its headquarters. The division committed itself to publishing thousands of informational booklets, strip maps and pay for roadside advertisements all in an effort to promote the highway. Membership was also offered to local businesses on the route between San Diego and El Paso, Texas.^[40] In the following years, the highway's popularity increased dramatically. During the 1950s, more motorists traveled on US 80 between Arizona and California than on the famous US 66.^[3] Approximately 2,500 cars travelled on US 80 each day by the middle of the decade. Arizona's five largest cities of the time were also located along the highway.^[41] Like its northern counterpart, US 80 also featured many iconic road side businesses and attractions, which included Boothill Cemetery and the O.K. Corral in Tombstone, Stoval's Space Age Lodge in Gila Bend, Yuma Territorial Prison, the Geronimo Surrender Monument near Douglas and the Painted Rock Petroglyph Site. Rows of iconic neon signed motels aligned US 80 in the many towns and cities it passed through, including Tucson's Miracle Mile. High demand for motel rooms by U.S. Army personnel and the postwar population boom in Tucson resulted in an explosive growth of hotel and restaurant construction on Miracle Mile and Benson Highway southeast of downtown.^[37] As of 2016, many of these attractions and structures have been listed on the National Register of Historic Places.^[10] The Mule Pass Tunnel was constructed in 1952, becoming the longest tunnel in Arizona.^[6] Two straighter and faster alignments of US 80 were constructed in 1956, bypassing the Gillespie Dam area and Cienega Creek.^[5] The January 1956 issue of Arizona Highways magazine was partially dedicated to the state's section of US 80.^[41] In 1961, the Arizona Highway Commission voted to designate the entirety of US 80 in Arizona as part of the Jefferson Davis Highway.^[42]

End Of An Era

Following the creation of the Interstate Highway System in 1957,^[43] Interstate 10 and Interstate 8 were both slated to replace US 80.^[44] In 1948, the Arizona Highway Department approved construction of the Tucson Controlled Access Highway, a freeway bypass around the core of Tucson. This would become one of the first sections of I-10. Though a state highway, initial construction of the bypass was funded by a 1948 city bond issue passed by the city of Tucson.^{[45][37]} The new bypass originally ran between Congress Street and Miracle Mile. At first, this bypass lacked overpasses and interchanges between Grant Road and Speedway Boulevard.^[37] The new bypass was extended eastward by 1956 to an interchange with US 80 and US 89 at 6th Avenue and Benson Highway.^[5] By November, the bypass was signed SR 84A.^[46] Construction started in 1958 to rebuild SR 84A to Interstate standards.^[37] In 1957, work began on a section of Benson Highway (US 80) southeast of Tucson to upgrade the road into a four lane divided highway. Of the 7.25 miles (11.67 kilometres) of upgraded road, 4.25 mi (6.84 km) were slated to become part of I-10 and be built to full interstate

standards. The segment became the first federally funded Interstate Highway construction project in Arizona.^[47] This section was completed by December 1960.^[48] The new section of I-10 had full freeway interchanges and frontage roads at Craycroft Road and Wilmot Road with a third planned later for Valencia Road.^{[48][47]} Other sections of US 80 and SR 86 east of Tucson were also being upgraded into new sections of I-10, with a total of four freeway interchanges between Tucson and Benson complete.^[48] Other sections were rebuilt into a four lane divided highway around 1958.^[49] I-10 west of 6th Avenue and Benson Highway up to Flowing Wells was completed by 1961, with a sections north of Tucson through Marana well under construction.^[37]



Decayed neon sign for the Linger Longer Court in Tucson. This US 80 motel fell into decline after the Interstate bypass and was torn down.

By 1963 construction was under way on rebuilding sections of US 80 and SR 84 between Casa Grande and Yuma into I-8 as well as parts of SR 84 between Picacho and Casa Grande into I-10.^[50] Most of I-8 through Arizona was completed by 1971 as well as most of I-10 in the southeastern part of the state. Most of US 80 had been fully rebuilt into I-8 between Blaisdell and Gila Bend, save for a standalone section between Ligurta and Mohawk. In the eastern part of Arizona, I-10 had been completed between 6th Avenue and Valencia Road as well as taking over all of US 80 between Valencia Road and 4th Street in Benson. Both Interstates were complete between Gila Bend and Tucson, replacing or bypassing almost all of SR 84. Between Benson and the New Mexico state line near San Simon, former SR 86 had been rebuilt into I-10 and decommissioned.^[51]

With new Interstate Highways taking its place as the main routes, US 80 was becoming obsolete.^[21] Motorists were bypassing business districts on the Interstates. Motels along US 80, such as the ones along Miracle Mile in Tucson, saw a sharp decline in popularity. Many motels went out of business and were torn down, while others had to face growing crime rates within the neighborhoods the businesses were located in.^[37] The growing obsolescence of the highway also caused the western states to view the US 80 designation as redundant. Between 1964 and 1969, California retired its section of US 80 in favor of I-8, effectively moving the western end of US 80 to the California state line in Yuma.^[21] In 1977, Arizona requested a truncation of US 80 to Benson. The American Association of State Highway and Transportation Officials (AASHTO) approved the request, decommissioning all of US 80 between Yuma and Benson as of October 28 of that year.^[21] Part of the section of US 80 between Gila Bend and Phoenix became an extension of SR 85.^[52] In 1989, both Arizona and New Mexico requested the elimination of US 80 in both states. The request was approved by AASHTO on October 6.^[21] The remaining section of US 80 in Arizona was subsequently downgraded to SR 80.^[53] A former section of US 80 between Buckeye and Phoenix, signed as SR 85 at the time, was still used by Interstate traffic through Phoenix until I-10 completed construction through Phoenix in 1990.^{[54][52]} A few sections of old US 80 throughout Arizona pay homage to the retired highway in their names, such as Old U.S. Highway 80 between Gila Bend and Buckeye.^[6]

Historic Route 80

In 2012, the Tucson Historic Preservation Foundation (also known as the THPF) embarked on preliminary work needed to apply for a state historic designation of US 80 in Arizona. The foundation commenced survey and mapping work on old sections of the route the same year.^[55] Over \$100,000 was spent by the THPF to initiate the historic designation process.^[3] Further research by the THPF utilized essays written for the Arizona Department of Transportation and Federal Highway Administration as well as a US 80 driving guide written by Jeff Jensen. Further resources were obtained through the special collections of the University of Arizona and Arizona Historical Society. Findings by the THPF concluded at least 40 separate segments of former US 80 in Arizona survive un-interrupted.^[3] In July 2016, the THPF finished all necessary preparation work for a historic designation and submitted a formal application for the Historic US 80 designation to the ADOT Parkways, Historic and Scenic Roads Advisory Committee.^[55] The proposal included several



US 80 is an Arizona state designated Historic Road.

attached letters of support from various historical committees, mayors and city council members of several towns which the designation would affect.^[10]

During a meeting on June 20, 2017, the Parkways, Historic and Scenic Roads Advisory Committee decided to unanimously recommend the Historic Route 80 designation to the Arizona State Transportation Board.^[55] By August 2018, ADOT was close to completing required reports for the Arizona State Transportation Board needed to sign and designate the segments of Historic US 80 that are part of the state







The historic Tucson Inn motor hotel as it looked in 1956. The Tucson Inn along with most of Tucson's Miracle Mile was added to the National Register of Historic Places in 2017.






highway system. ADOT is also working with respective local governing bodies to sign and designate the segments that are no longer part of the state highway system.^[3] On September 21, 2018, all preparation work was complete and the ADOT Parkways, Historic and Scenic Roads Advisory Committee officially adopted US 80 as a state designated Historic Road.^[56] The Historic Route designation connects to and supplements Historic Route 80 in California.^[55] Historic US 80 is the fourth state designated Historic Route in Arizona, joining Historic Route 66, the Jerome-Clarkdale-Cottonwood Historic Road (Historic US 89A) and the Apache Trail Historic Road.^[57]

In parallel with the Historic Route 80 designation project, the City of Tucson submitted an application to add a segment of former US 80, known as Miracle Mile, to the National Register of Historic Places in Summer 2016.^[55] On December 11, 2017 the application was approved and the segment added to the NRHP became known as the Miracle Mile Historic District. The Historic District includes part of Stone Avenue, Drachman Street, the southern segment of Oracle Road, West Miracle Mile (former SR 84) and a small two block section of Main Avenue south of the intersection of Oracle and Drachman. The Miracle Mile Historic District also includes over 281 man made structures including historic motor hotels among other roadside attractions and local businesses.^[58]

Major intersections

This list follows the 1951 alignment.

County	Location	mi [1][2]	km	Destinations [8][59][6][60]	Notes
<u>Colorado River</u>		0.00	0.00	 <u>US 80 west – San Diego</u>	California state line
		0.04	0.064	<u>Ocean To Ocean Bridge</u>	
<u>Yuma</u>	<u>Yuma</u>	2.63	4.23	 <u>SR 95 (16th Street) – Quartzsite, San Luis</u>	Now US 95
<u>Maricopa</u>	<u>Gila Bend</u>	119.15	191.75	 <u>SR 85 south (Martin Avenue) – Ajo</u>	Northern terminus of SR 85
		120.06	193.22	 <u>SR 84 east (Pima Street) – Casa Grande</u>	Western terminus of SR 84; SR 84 bypassed the US 80 Phoenix "Loop"; now I-8 Bus. east
	<u>Gila River</u>	142.37	229.12	<u>Gillespie Dam Bridge</u>	
	<u>Phoenix</u>	194.64	313.24	   <u>US 60 / US 70 west / US 89 north (Grand Avenue) / 7th Avenue – Wickenburg</u>	Western terminus of concurrency with US 60/US 70/US 89
	<u>Tempe</u>	202.77	326.33	<u>Washington Street west – Phoenix</u>	Interchange; now Center Parkway
		203.32	327.21	<u>Mill Avenue Bridge over the Salt River</u>	
	<u>Mesa</u>	210.46	338.70	 <u>SR 87 south (Country Club Drive) – Chandler, Casa Grande</u>	Northern terminus of SR 87
<u>Pinal</u>	<u>Apache Junction</u>	227.14	365.55	 <u>SR 88 north (Apache Trail) – Globe</u>	Western terminus of SR 88
		243.54	391.94	  <u>US 60 / US 70 east – Globe</u>	Eastern terminus of concurrency with US 60/US 70
	<u>Florence</u>	258.00	415.21	<u>Bridge over the Gila River</u>	
		260.91	419.89	 <u>SR 287 west – Coolidge</u>	Eastern terminus of SR 287
	<u>Oracle Junction</u>	302.90	487.47	 <u>SR 77 east – Oracle</u>	Southern terminus of SR 77
<u>Pima</u>	<u>Tucson</u>	321.98	518.18	<u>Bridge over El Rillito</u>	
		324.30	521.91	 <u>SR 84 west (Casa Grande Highway) – Marana, Casa Grande</u>	Northern traffic circle on Oracle Boulevard; western terminus of concurrency with SR 84; now SR 77 south
		329.74	530.67	   <u>US 89 south (6th Avenue) / SR 84 end to SR 86 west – Sahuarita, Nogales, Ajo</u>	Eastern terminus of concurrency with US 89/SR 84; eastern terminus of SR 84 ^[7]
	<u>Vail</u>	350.69	564.38	 <u>SR 83 south – Sonoita</u>	Northern terminus of SR 83
	<u>Cienega Creek</u>	353.51	568.92	<u>Ciénega Bridge</u>	
<u>Cochise</u>	<u>Benson</u>	375.83	604.84	 <u>SR 86 east (4th Street) – Willcox</u>	Western terminus of SR 86 eastern segment; SR 86 along with <u>SR 14</u> in New

					Mexico bypassed the US 80 "Loop" to Douglas; now I-10 Bus. east
<u>Tombstone</u>	396.51	638.12	 SR 82 west – Fairbank		Eastern terminus of SR 82
	415.19	668.18	 SR 90 west		Eastern terminus of SR 90
<u>Lowell</u>	426.01	685.60	 SR 92 west		Eastern terminus of SR 92
<u>Douglas</u>	446.92	719.25	 US 666 north – Willcox		Southern terminus of US 666; now US 191 north
	497.67	800.92	 US 80 east – Rodeo		New Mexico state line
1.000 mi = 1.609 km; 1.000 km = 0.621 mi					

Structures and attractions

The following is an incomplete list of notable attractions and structures along old US 80 in Arizona:^{[10][41]}

- Ocean To Ocean Bridge, Yuma
- Ruins of Dome, Arizona
- The Space Age Lodge, Gila Bend, built in 1962 and currently owned and run by Best Western^[61]
- Gillespie Dam, Gila Bend
- Gillespie Dam Bridge, Gila Bend, 1927 bridge across the Gila River next to the Gillespie Dam^[29]
- Agua Caliente, Arizona
- Horseshoe Cafe, Benson, 1940s cafe^[62]
- Arizona State Capitol, Phoenix
- Tucson Inn, Tucson, part of the Miracle Mile Historic District^[58]
- Ciénega Bridge, Historic concrete arch bridge in Pima County^[26]
- O.K. Corral and C.S. Fly's Photo Gallery, Tombstone, site of the infamous gunfight between the Wyatt Earp, Virgil Earp, Morgan Earp and Doc Holliday against the Clantons^[63]
- Queen Mine, Bisbee, a copper mine opened in the late 19th century and ceased mining operations in 1975 that is open for public tours^[64]
- Gadsden Hotel, Douglas
- Geronimo Surrender Monument, Douglas



C.S. Fly's Photo Gallery in Tombstone

See also

- Arizona State Route 80
- U.S. Route 66 in Arizona
- U.S. Route 80
- U.S. Route 180

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External links

-  Geographic data related to **U.S. Route 80 in Arizona circa 1951** (<https://www.openstreetmap.org/relation/2808849>) at OpenStreetMap
- **U.S. Highway 80** at American Roads (<http://www.americanroads.us/ushighways/ushighway80.html>)
- **Bygone Byways** (<http://home.comcast.net/~bygonebyways/>) – Includes several resources related to US 80 in Arizona
- **January 1956 Issue of Arizona Highways** (<https://azmemory.azlibrary.gov/digital/collection/aho/id/740/rec/11>) – Featuring US 80
- **Old Spanish Trail Centennial** – historical re-enactment <http://www.oldspanishtrailcentennial.com/home.html>

80 U.S. Route 80		
Previous state: California	Arizona	Next state: New Mexico

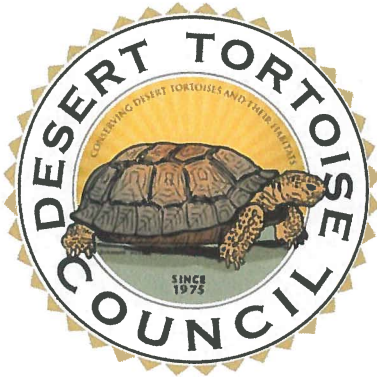
This page was last edited on 14 May 2019, at 04:41 (UTC).

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My family has property on the proposed route near Mile Wide and Sandario. This property holds 3 houses, my grandmother, my mother and father, and my Aunt and Uncle are the current occupants.

My grandfather a war veteran, bought the land before Sandario was a paved road. He managed to get 2 double wide manufactured homes all the way out there. One for him and his family of 7 and one for his mother in law, my great grandmother. Later my mother brought another home to the land. The home I grew up in along with my two sisters. For many years I raised my own son and daughter there. My cousins grew up there as well. That property that they want to place a road over has been a home to 5 generations of my family. We

have built ponds and beautiful patios and generations of children have built play forts. We spend every holiday there. We celebrate life there. Weddings have been performed and funerals have been endured on that land. Children have grown and we have seen every victory and heartache that is humanity on that land. To us it is more than a property, more than something owned. We have love on that land. It is our families sanctuary where we can hide from the world, where we know we can always go when times are hard and be welcomed and be loved. Land that I will inherit if it is not destroyed. Land that we as a family had hoped would remain in the family till the end of time.



DESERT TORTOISE COUNCIL

4654 East Avenue S #257B

Palmdale, California 93552

www.deserttortoise.org

eac@deserttortoise.org

6 July 2019

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

Via email only to: I-11ADOTStudy@hdrinc.com

Subject: Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg, Arizona.

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats likely occupied by Morafka's desert tortoise (*Gopherus morafki*) (synonymous with "Sonoran desert tortoise"), our comments pertain to our concern regarding the proposal to place the planned I-11 freeway through the Avra Valley, west of Tucson, Arizona, instead of using the alternative of co-locating it along the already developed route of the I-10 freeway or using other methods to achieve the transportation goals desired.

For the reasons given herein, the Council formally opposes the development of the freeway through Avra Valley and recommends instead that the freeway coincide with the I-10 corridor.

Letters by the Tucson Herpetological Society and the Coalition for Sonoran Desert Protection, which the Council fully endorses, have well documented the many serious concerns, so our comments will be brief.

Desert tortoises are known to exist in the area of the proposed Avra Valley freeway and their movements, especially inter-population migrations and seasonal movements for feeding, will be impeded by the proposed new freeway. There will also be direct loss of viable habitat depending on the precise siting of the project.

We see from the DEIS that the planning team acknowledges that the Avra Valley alternative will cause far greater threat to populations of native species, including the desert tortoise, and will result in far more habitat degradation and most especially fragmentation of existing habitat than the alternative of co-location along the route of the current I-10 corridor. Although mitigation by constructing freeway crossings is proposed, our opinion is that no amount of mitigation can fully counter the effects of a freeway through habitat lands, most especially those already committed as mitigation for the Central Arizona Project, on habitat connectivity.

We appreciate this opportunity to provide input and ask that the Desert Tortoise Council be identified as an Affected Interest for this project, and that any subsequent environmental documentation for this particular project is provided to us at the contact information listed above.

Regards,



Edward L. LaRue, Jr., M.S.
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson

To WHOM IT MAY CONCERN,

I FEEL STRONG OPPOSITION TO THE RECOMMENDED ALTERNATIVE ROUTE DESCRIBED IN THE TIER I DEIS FOR INTERSTATE 11 FOR SEVERAL REASONS. 3.4 BILLION DOLLARS SEEMS LIKE A LOT OF MONEY TO SPEND ON A ROAD THAT ISN'T REQUIRED AS THERE IS ALREADY A ROAD THAT COULD DO THE SAME JOB WITH A FEW MODIFICATIONS. IT WOULD INCREASE AIR AND NOISE POLLUTION. IT WOULD ALSO ENCOURAGE AN INCREASE IN URBAN SPRAWL. IT WOULD INTERRUPT WILDLIFE CORRIDORS. THIS IS UNACCEPTABLE IN MY OPINION. NO MIGRATIONS, A DECREASE IN ANIMAL POPULATIONS BECAUSE ~~AND~~ THEY CAN'T ROAM, FIND MATES AND EXPAND TERRITORIES. I WANT TO ADD THAT IT IS CLOSE TO TUCSON'S MAJOR WATER SOURCE. ALL WE NEED IS FOR SOME SEMI TRUCK HAULING HAZARDOUS MATERIALS TO SPILL IN IT. GENERALLY SPEAKING, THE RECOMMEND ALTERNATIVE ROUTE ISN'T VERY WELL THOUGHT OUT AND PRETTY LAME. THINK IT ALL THE WAY THRU. SOME THINGS ARE MORE IMPORTANT THAN DRIVING SOMEWHERE QUICKLY.

Bill Lea

7/5/19

Leaf, A
I-3514

I-11 TIER 1 EIS STUDY team.

ADOT COMMUNICATIONS

1655 W. Jackson Street
Phoenix, az. 85007

Malden 126F

DEAR SURS -

By now you have received many
communications and letters. I think
I am safe in saying the majority
are in opposition to I-11. I as a
Tucsonian would love to have the
state on these -

How many? For? Against? Why?

I Stand in Opposition to I-11.

I Stand FOR -

The Pristine Virgin Sonoran desert -

- For it itself - The Sonoran -

Unique on the planet

- The Eco Tourism economy

- For the gifts of spirit and
love of our planet it gives
to all visitors.

- Way of life in Arava Valley - it
embodies the individuality of the West.

THERE ARE ALTERNATIVES THAT ARE
FAR LESS COSTLY THAT HAVE PUBLIC
SUPPORT - EXPAND I-10 - PROTECT
TUCSON'S ECONOMY.

THANK YOU - ARIENE LEAF

Don't be hoodwinked by the egregious behavior of 2 Vista Royale Residents.

At issue is the close proximity of the freeway to Vista Royale, an upscale subdivision in Wickenburg. Two Vista Royale (VR) residents took it upon themselves to propose a new I-11 Route that is 2 miles from our backyards. That is not the majority of VR residents' desires. The majority is either 5 miles or, no freeway at all. Leave the traffic on its current route going through Wickenburg on Highway 93 since according to your budget director, going out the 60 to 71 and then up to 93 is cost prohibitive. Although, she could not give a reason why it's cost prohibitive.

There is no longer a need or purpose for the freeway to be as close to VR as has been proposed. The town of Wickenburg has sent ADOT a letter to that effect. They have proposed moving the freeway another 1.5 miles west of where it had previously crossed highway 60. By doing that, the freeway should land at least 5 miles due west of VR. There is already a ranch road out there that passes to the west of Sols Wash. So, some of the work has already been done.

Here's the history of what 2 residents of VR did.

- They proposed a 'green route' and published a website 'protectourwickenburglifestyle.com' without the VR residents knowledge.
- The website was developed and a mailer arrived in mailboxes the day after the latest I-11 corridor meeting where the Town Manager committed, after a unanimous vote, to write a letter to the TOW asking ADOT to move the I-11 corridor 5 miles west of Vista Royale from the north-south boundaries.
- They hoodwinked the Town of Wickenburg, the ADOT Task Force and the Residents of Wickenburg to vote for the green route rather than allowing the task force to do what the task force committed to do in the June 6, 2019 meeting which was a unanimous vote to write a letter to the TOW to send a letter to ADOT to push the freeway 5 miles from the VR north-south boundary. Although these two residents may not have anticipated that the task force would vote in favor of a 5 mile western boundary, the website should have been shut down and the mailer should not have gone out until after the TOW June 17th meeting.

Please consider that a freeway 2 miles from our backyards will decimate the property values in VR forever and ruin our quiet lifestyle, whether the freeway is ever built or not. If it's on the books, people will steer away from VR, the values will continue to decline. There is no reason for this at all.

There is no longer a need or purpose for the freeway to be anywhere near our backyards as the Town of Wickenburg has notified you. Try to put yourselves in our positions. Would you want a freeway in your backyard?

Thank you

Elaine Lekas



Your desert needs YOU!



July 8, 2019

Arizona Department of Transportation
4000 N. Central Ave., Suite 1500
Phoenix, AZ 85012
Submitted Via: i11study.commentinput.com

Re: Comments on the I-11 Draft Tier 1 EIS

On behalf of Valley Partnership and its 350 Company Partners and almost 2,000 Members, advocating for responsible development, we thank you for the opportunity to provide comments on the proposed Interstate 11 (I-11) Draft Tier I Environmental Impact Statement (EIS). We are keeping the scope of our comments to the section of the proposed Interstate 11 located in Buckeye, Arizona, between I-10 and Wickenburg. The proposed recommended alternative has significant negative ramifications on major planning efforts between MAG, the Town of Buckeye, and many landowners in the region. For the following reasons, we ask that ADOT depart from the I-11 Draft Tier 1 Environmental Impact Statement and instead choose Alternative Route Option X when it issues the Final Environmental Impact Statement.

Demographic and Planning Context

For decades, population flows within the United States have been from the Northeast and Midwest to the sunbelt regions across the South. As a beneficiary of this long-term demographic trend, Arizona consistently ranks among the fastest growing states in America. In Arizona, Buckeye is its fastest growing city, placing it in the top five in the United States. And the fastest growing master planned community (MPC) in metropolitan Phoenix, Tartesso, is located in Buckeye.

North of Interstate 10, Buckeye contains numerous current and future master planned communities (MPCs) making it well-positioned to welcome these new residents. In addition to Tartesso, these MPCs include Festival Ranch (another current top performer), Spurlock Ranch, Sun Valley, Elianto, Hassayampa Ranch, Trillium, and Douglas Ranch. Additionally, Belmont and others MPCs are located adjacent in Maricopa County's jurisdiction. Collectively, these MPCs north of I-10 will host over 1 million future Buckeye citizens, and all the residences, jobs, amenities, and commercial activities to support them.

The Hassayampa Framework Study

Buckeye recognized that it needed to plan transportation infrastructure to connect and accommodate these planned population and commerce centers to each other and the broader existing regional community and economy. Through a synergistic, multi-year, participative process, they joined stakeholders in this area to create the Hassayampa Framework Study, which has been officially accepted by the Arizona State Transportation Board, the Maricopa Association of Governments (the relevant Metropolitan Planning Organization), Maricopa County, and the City of Buckeye. The Hassayampa Framework study is a multijurisdictional document that all of these regional stakeholders have relied on in the past and should be able to depend on going forward when making decisions about transportation planning.

Cheryl Lombard
President & CEO

11801 N. Tatum, Suite #224
Phoenix, AZ 85018
(602) 266-7844

In that vein, the City of Buckeye incorporated the Hassayampa Framework Study's contents for its General Plan for the critical area north of I-10. All MPCs north of I-10 were required to follow it in their large-scale community master planning negotiations and agreements with Buckeye. It has since been used as a mutually negotiated, reliable, authoritative tool used by both parties to guide major land planning decisions such as housing densities, and land use categories. Along major highway corridors, plans for greater density of population are included along with jobs, apartments, and other more intense uses by the planned interchanges.

Option X and Project Purpose

While Option X may not be the shortest or cheapest to build between I-10 and Wickenburg, it follows the route Buckeye and private land owners have relied on in their negotiations and planning maps and agreements.

Option X also better meets the objectives of the Draft Tier 1 EIS, as stated in I-11 public purpose and need documents, by "providing access to planned growth areas" in Buckeye and is "consistent with local and county level planning." For the area of Buckeye, north of I-11, the draft recommended alternative does not follow the local, Maricopa County DOT plans, or for that matter, ADOT state planning, all of which contain and adopted the Hassayampa Framework Study and the Buckeye General Plan.

Option X would provide a high-priority, high-capacity, access-controlled transportation corridor to serve the needs of future Buckeye residents when you include surrounding MPCs and would stimulate significant employment growth and provide access to job hubs. It would better enhance the entire high-capacity transportation network in this region of Maricopa County, thereby, supporting the area's economic vitality. Option X was studied, chosen and settled upon after a review of other alternatives as part of the Hassayampa Framework Study for this very reason.

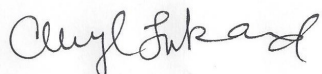
Looking internally in the City of Buckeye, Option X would better improve regional mobility for people and goods and directly access the significantly large economic activity center planned within this portion of the city. By comparison, the recommended alternative as currently presented would run through the much less densely populated planned sectors. Resident traffic loading and access would then require a majority of the area's residents to travel several additional miles to even access Interstate 11 and increase the number of vehicle miles driven and at slower speeds.

Opportunities for the development of intermodal corridors such as commuter rail and/or Amtrak to run in concert with Interstate 11 will be eliminated by following the recommended alternative through the extreme western edge of Douglas Ranch. Only Option X, will bring those transportation options to the core of a major economic and residential community within the City of Buckeye and Western Maricopa County.

Finally, we have concerns about broad impacts to Sonoran Desert tortoise habitat. In many segments, cumulative loss and degradation of habitat will occur on a landscape scale. In some cases, the degradation and complete loss of habitat is significant and may impact future listing of the species as threatened and endangered by the US Fish & Wildlife Service, something we avoided only a few years ago. To help avoid this listing and to allow for responsible development to still occur, incremental and localized mitigation has benefits and limitations, but consideration of a Programmatic Mitigation Plan (PMP) that identifies key areas and strategies to focus habitat mitigation efforts that are likely to provide greater mitigation benefits may also be helpful.

We hope it is this information is helpful in giving past engagement, reliance and commitments between landowners throughout this region with regional planning organizations and the City of Buckeye who went through a carefully designed planning process, and the activities on the Sonoran Desert Tortoise. We urge you to move the recommend alternative to Option X within the City of Buckeye.

Sincerely,



Cheryl Lombard
President & CEO

Highway 11 Proposal

I am against the proposed Highway 11 that would run through the Avra Valley (west and south of Tucson) for the following reasons:

-The proposed highway would uproot the families and homes that lie in its path and would do great damage to the financial, personal and emotional investments these folks have made over the years. In many cases the losses would never be fully recovered.

-The proposed highway would fill Avra Valley with car emissions degrading the remaining homes, properties, and health of the residents. A lot of people chose to settle in the Avra Valley to avoid the traffic, pollution and congestion of Tucson. For those folks who remain after the proposed construction, home values would plummet. No one wants to live near a busy highway. No one.

-The proposed highway would create constant noise; 24/7 (Do trucks coming out of Mexico have to pass U.S. pollution and noise requirements?)

-Much of Sahuaro National Park is oriented to the Southwest- as seen on a topo map. The visual presence of the highway would become a part of the experience of the Park, as would the traffic noise and consequent air pollution. Though the Park's boundaries are a mile or so from the proposed route, the experience of the Park would be dramatically degraded. Have any of you hiked in the Park? It is a special, and very American/Southwestern, experience.

-The same follows for the Ironwood Forest National Monument which would be hugely affected by the proposed highway. It seems that the economic and aesthetic value of these Parks is being vastly under-valued.

-The proposed route would cut very close to the Tohono O'Odham Nation undercutting the value of their nearby land. I don't believe the government has the moral right to degrade the value of any Indian land.

-I understand that provisions would be made to build in a few wildlife crossings under the proposed highway. That would be helpful but hardly makes up for the severe damage to habitat and already scarce resources that local wildlife depend on.

Increasing the capacity of the route from Mexico makes sense in the northwest part of the state where the infrastructure is under-built. But the existing infrastructure south of Tucson seems more than adequate for the current use. I know...I'm not the expert on this, you guys are. But I've driven Highway 19 between Tucson and Nogales many times and there's not much traffic on that road.

I also wonder if the technology for moving goods long distances will change in the not too distant future. Is it wise to invest billions of dollars in upgrading a highway now when another system may emerge that would render this method obsolete?

Lastly, I'm all for the "greater good" which in this case means that sometimes some of our citizens (including my family) have to sacrifice their well-being for the benefit of all. That's life. But the calculus requires that that which is sacrificed generates real benefits for "all". And for the proposed Highway 11 in south and west of Tucson, the benefit is unclear and is not worth the sacrifice. I VOTE NO BUILD!!!

Timothy Long
12237 W Fort Lowell Rd
Tucson, Arizona 85743

May 7, 2019

Karen Lowery
6021 S. Hopdown Lane
Tucson, AZ 85746
Hiker1724@yahoo.com

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

To Whom It May Concern:

No Interstate or multi-lane roads should go through or within 5 miles of any pristine or sensitive areas, such as National Forest, National Parks or Monuments, State Parks, Preserves or Recreational Areas. These areas need to be kept safe and noise and pollutant free, and therefore, the proposed route for I 11 is unacceptable.

Why does the State of Arizona need another Interstate Highway, especially when the plan is to put it through natural sensitive desert areas that have no major cities? The Sonoran Desert Museum and Saguaro National Park are well-known in the United States as well as internationally. They attract many visitors who enjoy experiencing the natural beauty and quiet of the desert. An Interstate Highway would destroy parts of the desert that surround the Museum and National Park, pollute the air and create unwanted noise and potentially hurt the tourism business that these places bring to Tucson, not to mention the harm to animals and natural vegetation.

Another reason not to build a freeway through the proposed desert route, is because there are numerous citizens that have chosen to live in a quiet, uncongested rural area. Their right to live in a desert rural area with no interstate highway creating noise, pollution and congested needs to be respected. I live 3 miles from I 19 and there are days that I can hear the interstate traffic and see it. Remember they invested in their property because there was no noisy and dirty highways near them.

Also another interstate will cost the state a lot more money to maintain and patrol. From my understanding there are numerous surface roads that are in need of repair and the state does not have money to maintain them. Also, if this is a truck route there would need to be truck stops and other facilities to accommodate truck drivers. These would further degrade the area.

In my opinion, there is no logical reason for I 11 to connect with I 19. Interstate 11 should connect with I 10 at Buckeye and continue to follow I 10 through Phoenix and Tucson. Or it could also follow state route 85 from Buckeye to Gila Bend where truckers could drive Interstate 8 to the Interstate 10. Keep the noise, pollution and congestion along existing interstate highways and in the cities where it belongs, not in peaceful rural areas, Desert Museum, National parks and Preserves.

I believe that the politicians and developers that are pushing and promoting the I 11 will benefit from it, while those of us who live in the rural desert and enjoy the quiet and beauty of the Saguaro National Park, Desert Museum, Ironwood Forest, cultural areas and preserves will not be heard or respected enough to say no to the proposed route or to just say no – to a new Interstate Highway.

A BETTER PLAN TO CONNECT ARIZONA CITIES WOULD BE TO CONSTRUCT A LIGHT RAIL OR COMMUTER TRAIN TO EASE TRAFFIC CONGESTION AND IMPROVE AIR QUALITY.

A Light Rail connecting Tucson, Phoenix and Flagstaff along the route of I 10 and/or other freeways would keep the noise and pollution within a corridor that is already noisy and is easily accessible. At major intersection and/or train stops parking areas can be constructed with shuttle services and/or public transportation to a variety of destinations.

Think about it. Many people travel to the airports, sports arenas, concert centers, hotels, and maybe even shopping areas. So a light rail that stops at these types of places would serve many people. Also, if people knew that they could travel to their destination quicker without traffic jams and be able to relax the light rail would be their primary choice. If travelers had a choice other than driving maybe there would be fewer alcohol or fatigue related accidents.

I would like to see the ADOT planners for I 11 come up with a plan for a light rail/ commuter train rather than go ahead with the offensive plan they have now. It is not too late to rethink a better plan to serve the people of Arizona.

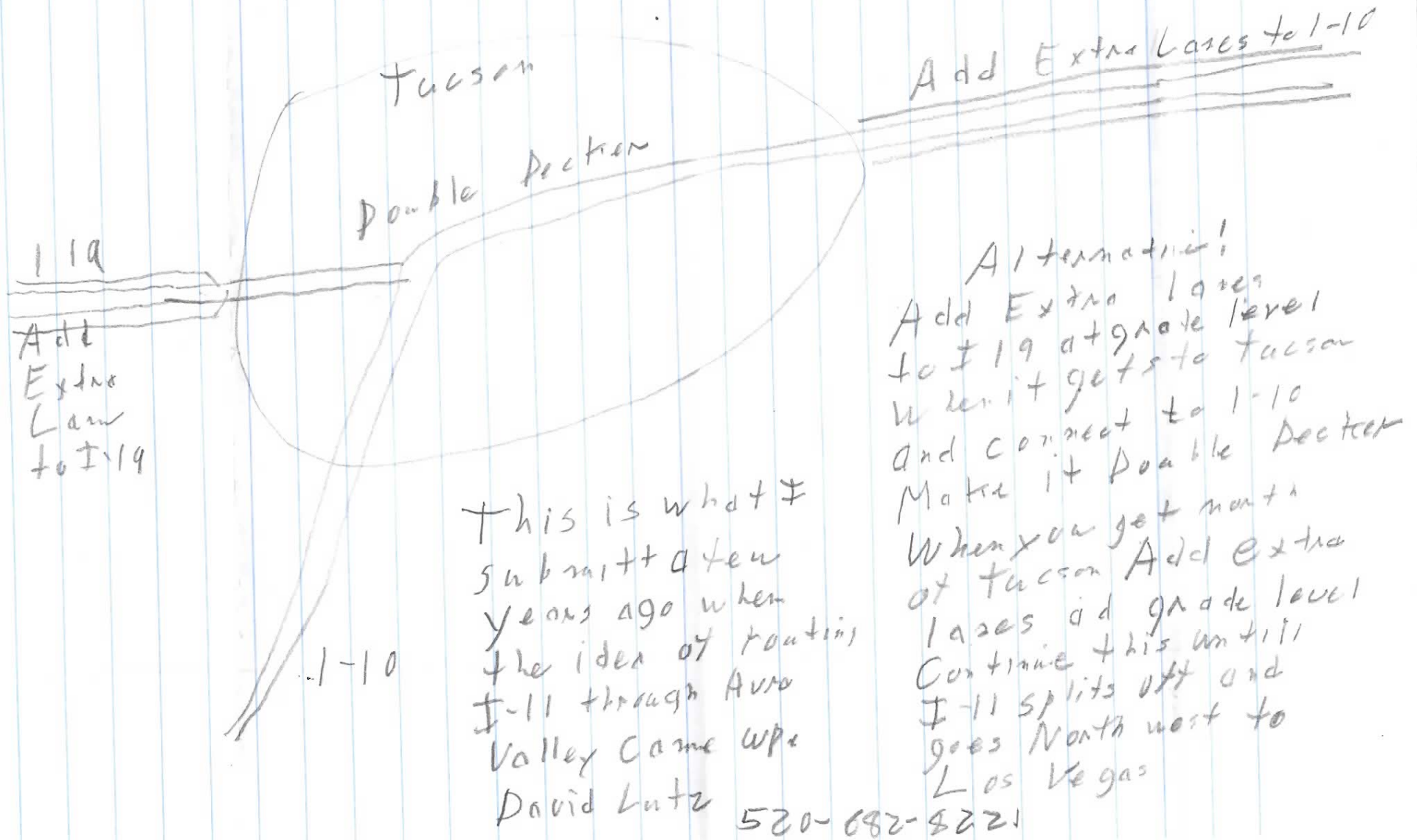
Sincerely,

Karen Lowery



Alternative to
Arvo Valley Freeway

Less Costly Alternative for I 11



This is what I submitted a few years ago when the idea of routing I-11 through Avra Valley came up

David Lutz 520-682-4221

David A Lutz
9850 W. Buxterville
Tucson, Az 85743
6/20/19

I-11 Tier 1 EIS. Study team

Dear Study Team,

I am opposed to I-11 through
Avra Valley. The negative impacts on
the Saguaro National Park and The
Ironwood National Monument is not
worth the benefit that it would
bring.

The new freeway would have
adverse effects on this area. It ~~would~~
would bring sprawl up to the boundary
of the Saguaro National Park and
Ironwood National Monument.
It would hunt wildlife. A lot of
people would lose their property.
~~It~~ It would take traffic away
from business in Tucson.

The benefit would be a reduction
at travel time from Wickenburg
to Nogales by only 45 minutes. This
is not worth the impact it would
have on Avra Valley.

over

If something must be done I support
the Orange alternative. Expand existing
freeways such as I-19, I-10 and use
State Rout 85 going North from Gilu Bend

Sincerely yours,
Keith N. Lutz

21 June 2019

Re: Interstate 11 Proposed Corridor

Elizabeth Makings
3931 E. Carson Dr.
Phoenix, AZ 85042
elizabeth.makings@asu.edu

Dear ADOT,

The purpose of this letter is to express my objection to the Arizona Department of Transportation's preferred alternative of the proposed I-11 corridor specifically in Sections 3 and 4, from Marana to Buckeye (the "Green alternative" or "preferred alternative"); and my support for the Orange alternative.

The process by which the preferred alternative was selected is concerning, with no mention of the individuals involved nor any justification for it. Who decided on this route? The project manager for the I-11 corridor? A collection of bureaucrats? The Governor-appointed head of ADOT? All of the above? And where is the evidence/justification? In public meetings we are never given the details of exactly *why* this is the preferred alternative, only a set of bullet points in a highly produced video voiced over by an unknown narrator claiming "Tribes, municipalities, and other stakeholders were consulted." It is one thing to acknowledge stakeholders, but hard to believe any of their input was valued and carefully considered given the expensive and destructive outcomes of ADOT's choice. That this information is withheld from the public is disturbing and unacceptable. The decision to direct the I-11 in the corridor through the Santa Cruz Flats is illogical, uneconomical, and lacks environmental integrity and this is why:

Economics and logistics:

In a statement, ADOT says "The purpose of I-11 is to provide a high priority, high-capacity, access-controlled transportation corridor to serve population and employment growth; support regional mobility; connect metropolitan areas and markets; enhance access to support economic vitality; and provide regional route redundancy for emergency and defense purposes." Additionally, ADOT's goals are to "bolster the performance of Key Commerce Corridors." In fact, the opposite is likely in the Green corridor as it diminishes the potential for development by diluting the

density of lands available for commerce. Indeed, the argument can be made that existing corridors are the *only* logical alternatives that allow for commercial potential along right of ways. Consider for example, the existing I-10 corridor in the segment from Marana to Casa Grande where land is a complex patchwork of private, BLM, and State ownership that would make the logistics of development challenging to say the least. A brand new freeway adjacent and parallel an existing freeway where in some places they are less than 5 miles apart? I find this ludicrous and excessive and wonder how this make sense at any level? Was there a cost/benefit analysis that justifies this need? If not, why? And if so, why was it not justified to the public? I have been traveling along the I-10 corridor from Phoenix to Tucson for over 25 years and the “economic development” in the area between Casa Grande and Marana is thankfully hardly noticeable. (One example of a retail attempt is the Casa Grande Outlet Stores, which is currently an abandoned piece of real estate). It is hard to imagine the need for *more* freeway corridor commercial opportunities in this stretch when the current freeway is hardly bulging with business interests.

Cost to taxpayers for new roads and corridors will be enormous yet arguably superfluous given the alternatives with existing corridors. If “regional route redundancy for emergency and defense purposes” is invoked, why then are there not parallel freeways along the I-17, for example, or any other interstate freeways that has the potential for backups and delays.? These are nonsensical and ridiculous arguments to justify spending, sold to the public under the guise for “event safety,” “weather incidents, or “defense purposes.”

Detailed environmental analyses for new corridors is wasteful and unnecessary while enlarging existing rights of ways is logical and justifiable, and expedient. The flat and sparsely developed I-10 segment between Marana and Casa Grande is ideal for such expansion physically and economically.

In ADOT’s scoping phase in 2016, “Agencies commented on the potential Build Corridor Alternatives” and “The “Desire for economic benefits to rural communities” was noted. Unfortunately, “Agencies” are not “rural communities,” they are politicians with built-in economic agendas that often don’t align with the people they represent, and especially in rural Pinal County where the new I-11 will slice through, causing major upheaval and disruption in the name of economic progress. I am not a retiree living in

Arizona City, but I can imagine they have no interest in a backyard freeway. On the contrary, residents there chose the area for the quiet and rural nature and not for any attendant “truck stop” economic improvements. The opinions of mayors should not be portrayed as those of the community as a whole but this is exactly what ADOT is leading us to believe.

Environmental Impacts:

Concern regarding impacts to the Sonoran Desert as well as wildlife corridors were *consistently voiced* in various forums during public comment periods, yet how these concerns were dealt with remains mysterious even as we are told it has been a “collaborative process... structured to involve people early and often.” The consultants hired by ADOT to do the environmental impact assessments address it in a one-dimensional way: impacts to the Pima Pineapple Cactus (*Coryphantha robustispina* subsp. *scheeri*). I can assure you, a survey for the presence of the Pima Pineapple Cactus, which, if we are to believe the reports and video, is the only species of concern, is not a meaningful environmental assessment. It ignores everything else that is environmentally and culturally sensitive in the area including some of the most valuable riparian habitat in the region – a critical source of semi-permanent water, important stopover for migrating birds, and habitat for resident wildlife. The new ADOT preferred corridor is funneled *directly* through the Santa Cruz River at this very limited point where the riparian vegetation has established itself and provides priceless habitat (see photo). I have personally seen bobcat, deer, javelina, crested caracaras, great-horned owls, and yellow-billed cuckoos, just to name a few. Many small mountain ranges also punctuate the Flats in this area, magnifying the value of the Santa Cruz River as a wildlife corridor. So while the consultants found no *endangered species* that ADOT is obligated by law to mitigate for, they failed to recognize the importance of the overall habitat as prime real estate for plants and animals. No, willows and tamarisk are not endangered species, but they are collectively endangered habitat, and should be considered as such regardless of any official Federal status. Build-out of the Green alternative will be a soul-crushing decision to those of us fighting to save what is left of our natural environment, but more importantly, a death sentence for the wildlife that live there.



The Santa Cruz River (Greene's Canal) near the Sawtooth Mountains. The proposed I-11 corridor would go directly through this riparian habitat. Photo credit: E. Makings Sept. 2019.

In the I-11 Draft Tier 1 Environmental Impact Statement, we read, “The results of the biological resources analysis were considered in identifying the Recommended Corridor alternative.” They may have been considered but subsequently must have been dismissed since the *only* corridor that will impact wildlife and critical habitat is the ADOT/FHWA preferred alternative. Neither of the other two alternatives, Orange or Purple, impede on the Santa Cruz River in this area, so this statement is head-scratching at best. In all, the ADOT preferred route following the Santa Cruz River along the Santa Cruz Flats removes existing farmlands and rangelands, and destroys critically important riparian habitat, despite its label as “environmentally friendly.” In fact, the “potential impacts to sensitive areas” highlighted in the brochure (I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation) handed out in the public meetings,

clearly indicates the ADOT alternative to be the *worst* choice in terms of impacts on the environment. A proposal cannot be simultaneously environmentally friendly and environmentally destructive and ADOT's marketing of this decision is highly misleading.

The proposed corridor is the most environmentally destructive alternative of the three presented and cannot be justified on any level. One cannot help but be skeptical of this decision given the perfectly acceptable adequacy of existing corridors as well as the unacceptable price tag the taxpayers will shoulder by choosing ground-zero construction. Is economic gain for unnamed individuals or corporations in this project a motivation for ADOT's decision? The lack of transparency suggests there are unknown partners with apparent decision-making powers that are steering the course of events regardless of opposing public comment and environmental consensus. In the Alternative Selection Report we are told that "Based on the impacts analysis and the comments received on the Draft Tier 1 EIS, the Final Tier 1 EIS will identify and define a Preferred Corridor Alternative. After consideration of all final comments received, the ROD will:

- Identify a Selected Alternative (Build or No Build);
- **Present the basis for the decision;**
- Describe the corridor alternatives considered; and
- Provide strategies to avoid, minimize, and mitigate for environmental impacts."

Unfortunately, the final phase is much too late to reveal the "basis for the decision." This pre-determined, preferred alternative is a poor and opaque decision that rejects environmental concerns, ignores economic outcomes, and adds millions in costs to taxpayers. If the Record of Decision is indeed ADOT's preferred alternative, which seems likely, there are no strategies that can possibly "avoid, minimize, and mitigate for environmental impacts" since the most environmentally sensitive reach of the Santa Cruz River in the region will be permanently altered by freeway construction.

In summary

- The least invasive Orange alternative is preferred
- Widening of the established I-8 and I-10 corridors is the logical alternative as it will allow for higher capacity routes, improved safety and mobility.

- Increasing lanes along the I-10 is the economically superior alternative to building brand new infrastructure.
- Increasing lanes along the I-10 is the environmentally superior alternative to building brand new parallel freeways as it preserves an important regional riparian corridor and wildlife habitat.

Elizabeth Makings
Phoenix, Arizona

Recommended reading:

Brown, D.E., E. Makings, A. Neils, D. Jenness, R. L. Glinski, R. D. Babb, M. B. Traphagen. 2017. Biotic Resources of the Lower Santa Cruz River Flats, Pinal County, Arizona. *Desert Plants* 32(2):51 pp.

https://biokic.asu.edu/sites/default/files/biotic_resources_of_the_santa_cruz_flats-desert_plants-vol_32-2.pdf

Jenness, D. 2019. Birding the Santa Cruz Flats. Arizona Field Ornithologists http://www.azfo.org/birding/documents/azfo-birding-santa-cruz-flats_final.pdf



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

Would it be possible to obtain a ^{detailed} layout of the I-11 route map on the west side of the City of Tucson? ^(the 3' x 6' on the tables)

Contact Information (optional)

Name Mike Marietti / City of Tucson Email michael.marietti@tucsonaz.gov
 Address 201 N. Stone Ave, 4th Floor
 City Tucson State AZ ZIP 85701

Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact Laura Douglas, ADOT Community Relations Project Manager, at 602.712.7683 or ldouglas@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

有关中文信息, 请致电 1-844-544-8049.

CONTACT

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

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingual) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0MS180 01P | Federal Aid No. 999-M(161)S

i11study.com/Arizona

I-11 Tier 1 EIS Study Team
% ADOT Communication
1655 W. Jackson St Mail Drop 126 F
Phoenix AZ 85007

My name is Joyce Martin. My husband and I have lived on our property on Sardano Rd near Mile Wide Rd. for over 46 years. My husband served in the Air Force, was stationed in Okinawa and Viet Nam, plus TOY in South Korea during the Pueblo crisis. Our children grew up on this property. Our son still lives in the neighborhood. From what we've been told I-11 will take our property. With both of us in our 70's, it would be next to impossible for us to move everything we have collected in the last 4 1/2 decades.

We were unable to attend the meeting at Marana High School on May 11 because we were out of town. On May 8 we flew to Augusta, GA for our only grandchild's college graduation. However, what was suppose to be a

happy event turned tragic. Our grandson committed suicide on May 9. Before we even got to see him. This after losing my mother in February was really hard to take. Not a good year for us thus far. Upon returning home, we then heard of the first choice for the I-11 corridor. You can't imagine how devastated we are, with everything we had just endured. Our world has been turned upside down and inside out.

The property just west of ours has two people who would also be made homeless. The owner of the property is an 80 year old lady. Her home is well known in the area as the Battle House. Articles have been published in the Tucson newspaper on more than once. These buildings were built in the early 60's and need to be saved.

The other individual is another totally disabled Viet Nam vet with PTSD and no family. Will the

Federal government or ADOT help him find a new place to live? Will you help move all his belongings? I don't believe that will happen. So what is he to do?

How many more stories are out there like ours? Many families in just this neighborhood are retired and/or have lived in this area for 20 years or more. An ADOT spokesperson said a combination I-10/I-11 route through Tucson would cause destruction of some neighborhoods. What does she think will happen along the I-11 corridor through the Altar & Quira Valleys? Is it her opinion, anyone out here doesn't matter? Our neighborhoods are not being destroyed? Who does she think she is? Has she ever seen the palo verdes blooming in Quira Valley? Or the cacti bloom? Everything was outstanding this year due to the rains. So much of that will be destroyed if I-11 goes through.

If I-11 goes through our area as planned, the neighborhood would be cut in two. Irico and the water company run new lines at what cost? Is ADOT even concerned? How much revenue will each company lose or any other utility that will be in the I-11 corridor?

With the difference in cost between the I-10/I-11 route and the Qltar/Qura Valleys route, how can anyone support the second. \$3.4 BILLION sounds like a waste of taxpayer monies to me. And when has a government project ever been under budget? If I-11 goes through Qltar/Qura Valleys as proposed, it's another case of government abuse of power. I would really like to know who's behind this and why.

With the expansion of I-10 from 4 lanes divided to 6 lanes divided to Phoenix, why is I-11 needed. It will only be 2 lanes with both automobiles and semi trucks at a 75 MPH speed

limit. There is always someone who will exceed speed limits, which leads to accidents. With a shortage of police now, how does ADOT plan for the addition of I-11? I-11 will also make it easier for human and drug smugglers to get to Phoenix and beyond. A group of us often ride in the Ironwood Forest and have seen first hand the trash left by illegals. We do our best to leave the land better than when we came.

Several newspaper articles and letters to the editor are against I-11. One letter from a Southside resident referred to NIMBY Hypocrisy. Mr. Southside isn't facing losing everything. He needs to walk in our shoes for a day. He also gave no reason for I-11 to be built out here.

Kitt Peak telescopes are bothered by light pollution from Tucson. Won't I-11 add to that problem?

The Desert Museum has a scenic viewing area looking over Arava Valley. How scenic will that be with I-11 running through the valley? Not to mention the noise and air pollution. The Desert Museum draws thousands of locals and tourists, not to mention all the school trips made every year. How much would it be impacted?

The worst part is the impact on the plants and wildlife. We have at least 100 saguaro on our property. How many can be saved? Will they be saved? Ours is just one small portion of this corridor. What will be the impact on the Tucson Wildlife Mitigation Corridor? I-11 should never be allowed to cross this area. Big horn sheep have been spotted in the Tucson Mountains. They had to come from the west from an existing herd. What happens to them in the future? We feed and water the birds including hummers. We often see coyotes and javelina on our property.

Summary: I-10/I-11 Route

Pro:

At least \$3.4 Billion less cost for taxpayers.

Con:

Loss of some neighborhoods in Tucson

Altar Valley / Avra Valley Corridor:

Pro: None

Con: Loss of wildlife habitat

Air, noise, light pollution

Increase in Valley fever possibility

Loss of revenue for Tucson

Threaten Tucson CAP water supply

Encourage urban sprawl

Destroy rural character of the valleys

Sever critical wildlife corridors

Impact Saguaro National Park West.

Ironwood Forest and Tucson

Mitigation Corridor

Lower property value (loss of tax revenue)

Hundreds losing homes and property

Thousands impacted in corridor

We are only two fighting for our
lifestyle of 46 years.

46 years!

46 years!!

46 YEARS!!!

How would you feel if you were
in our shoes?

Joyce Martin
1855 N. Sandario
Tucson AZ 85743

Negative consequences of building Interstate 11

The large footprint for building a new Interstate 11 would have negative consequences to hundreds of thousands of acres of federally protected lands, local open spaces and private property.

This is a time when we need to protect our natural habitats and our kids' and grandchildren's futures. More forward thinking is needed to create ways of alleviating traffic flows and pollution by using new technology and not continuing our same wasteful ways.

Sue Dunn
West side

Martin, J
1-3249

This is just one of several
letters to the editor. (See
next pages.) Word is getting
out on this disaster.

CC: Congressman Paul Grijalva
Sharon Bronson

MY VIEW: David Fitzsimmons

Contact editorial cartoonist David Fitzsimmons at 573-4234 or tooner@tucson.com



An alternative to Interstate 11

Save our iconic valley from CanaMex Highway

No doubt the need is there for Tucson bypass and a Canada/Mexico highway.

But, a 75 mph interstate highway in Avra valley would have severe consequences. Locating a highway here would do unjustifiable harm to Ironwood National

Monument, Tohono O'Odham tribal lands, Saguaro National Park, Tucson Mountain Park, Kitt Peak National Observatory and thousands of property owners.

This highway would undo the safeguards put in place to protect plants and wildlife in these areas. Valley fever cases, noise, light and air pollution would all rise. Urban sprawl would have a heyday here. Tucson businesses would lose millions of dollars in revenue due to this location. Property owners who don't lose their homes to eminent domain would see a plummet in the value of their investment.

Co-locating with I-10 in a 21st century fashion could save this iconic and peaceful valley.

Dreama Hubbard

Southwest side

1-3249
Martin, J

Thanks for your informative and thorough coverage of proposed Interstate 11 routes. One alternative not mentioned is absolutely the cheapest, least environmentally destructive, least congestive, simplest and easiest: set up congestion fees for thru trucks on I-10 operating between 7 a.m. and 7 p.m. Nighttime hours could be free.

The technology is ubiquitous on toll roads everywhere. The only major cost is keeping the Mariposa Port of Entry in Nogales open overnight, something that would decrease congestion at this very busy border crossing during the day, allowing border agents to process autos and pedestrians much more quickly.

Truckers could easily adapt to this and enjoy the open road during the night, logging more and cheaper miles. The Avra Valley, Desert Museum and Saguaro Park West could remain unmolested. And the billions of dollars could be diverted for needed road repairs.

What have I missed? Greedy landowners, developers, road contractors, car dealers, oil companies perhaps, for whom any road is a good road. Is this "alternative" too sensible?

Steve Johnston

West side

Let's stay united in opposing I-11

Re: the May 12 article "In Avra Valley, a chance to stand up for species survival."

Tim Steller wrote a great article on why the I-11 corridor would be terrible for our unique flora and fauna. Readers pointed out that we should focus on the devastation to people and their homes. The point is the corridor will be bad for everything and everybody, the environment, business including tourism, and of course the many communities of people and their homes in or anywhere near its path. For those of us, and we are many who are opposed to this potential travesty, let us pledge to support one another's reasons for opposing the corridor, and not spend time figuring out whose reasons are more important. All the reasons already and yet to be articulated are important, and we can win this battle if we stay united. And we must win this battle.

Dorian Dodson

Sahuarita

I-11 bad for all in Pima County

The recommended Interstate 11 route through Pima County is bad for all. Property owners from Sahuarita to Marana and in between will face loss of their homes and properties through eminent domain. The property value of homes not directly in the path but near the 400-foot-wide superhighway will plummet. Tucson gas stations, restaurants, motels and other businesses will collectively lose millions of dollars in revenues as travelers and commercial vehicles bypass the city on I-11. The path of the proposed highway winds its way through the Avra Valley next to Saguaro National Park, Tucson Mountain Park and Ironwood Forest National Monument, one of the most unique and scenic areas in the United States. This route will have a devastating effect on our desert creatures, their habitats and the unique Sonoran Desert landscape, a magnet for hundreds of thousands of visitors and tourists every year.

Gene Valdes

Sahuarita

No to I-11

The more I learn about the proposed Interstate 11, the less I understand how anyone might think it is a good idea. Maps of the proposed area(s) have been shown.

However, these maps would be more informative if they showed all of the homes, businesses and schools that would be affected, along with a sidebar listing the number of people who would be displaced. Not to mention what this will do to our beautiful desert and the wildlife that call it home.

And what about all of the farmers, and their land that would be cut through for a freeway that almost runs identical to the existing one? This bypass would also have a negative effect on the existing businesses along I-10.

Please use the money to upgrade and fix our existing roads, not create an unnecessary new one.

Leslie Harris

Southwest side



MARTIN

Joyce Martin
1855 N Sandario Rd
Tucson, AZ 85743

PHOENIX AZ 852

06 JUN 2019 PM 3 L



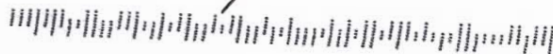
USA Forever



USA Forever

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85007-327999





**No Freeway
in
Avra Valley!**

Save our desert

7/2/19

I-11 Sec 1 EIS Study Team
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1655 W Jackson St
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Phoenix AZ 85007

Enclosed are several letters to the editor from the AZ Daily Star all against I-11. I also question if we are being listened to. I get the feeling that the decision has already been made against us. We are just wasting our time. But let me tell you, we're not going down quietly. It's not just us in the I-11 corridor against this. The cost of this to the taxpayers is outrageous. The cost to the wildlife + plant life is worse.

Joyce Martin
Avra Valley

22 JUNE 17

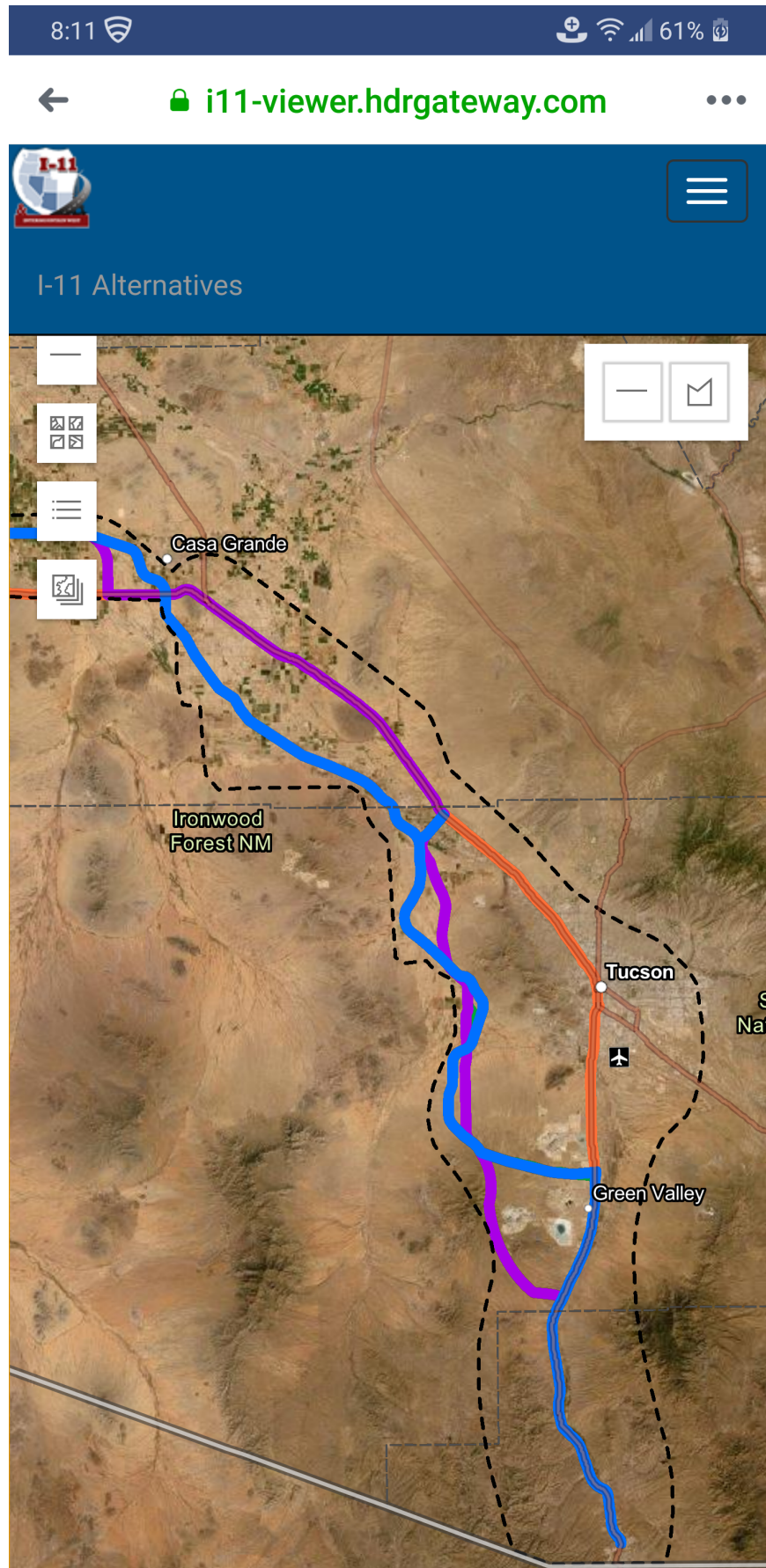
Martinez, R
I-3496

Rigoberto Martinez, Sr.
12855 W. Gunsmoke St.
Tucson, AZ. 85736

TO WHOM IT MAY CONCERN,

In writing this NOT in complete disapproval of your plans to construct a new (I-11) Freeway thru our community. Being a Native of Nogales I see no point in another Avenue for ^{MORE} Mexico Traffic. You have all the require space to enlarge the I-19 Corridor to 4 Lanes South & North Bound, with no reason to destroy the ecology & animal habitat & carving out the Sierrita Mtn. Range. Also Building an Additional Freeway to the North from Nogales & Bypassing Tucson, you also accomodate a new route to the transport of drugs & migrants, & the need for additional Customs & Border patrol Agents & Equipment, ~~MORE~~ AND ^{MORE} CK. points. ^{THE} Displacing thousands of families should be your prime concern instead of wasting money needlessly & burdening us with ~~MORE~~ & EXCESSIVE TAXES!

Yours Truly Rigoberto Martinez Sr.



I-11 DRAFT Tier Environmental Impact Study input and Questions

I. BPTT Recommended Positions

- Support the Recommended Corridor Alternative and the detailed engineering AND environmental process that was included
- Oppose the No Build Option

II. Justification statements for Recommended Corridor Alternative

- Multiple previous studies/plans have recommended a true alternate route/corridor
- Provides an alternate route for north-south traffic from and to Mexico
- Provides an alternate corridor that enhances the ability to address regional emergencies, evacuations or defense events.
- Would serve as a trade corridor and relieve truck traffic from I-10; potentially saving the need to widen I-10
- Many of the areas of concern can be either avoided, minimized or mitigated at a much higher rate than the other alternatives; enabling the invested monies for the project to provide more mitigation, i.e. "higher and better use".
- The slightly modified Avra Valley route was developed as a consensus (and joint compromise) among all the subject matter experts consulted in the EIS
 - An example is the coordination of wildlife corridors with I-11 and the Central Arizona Project. The two agencies met and collaborated with the stakeholders in the Avra Valley including CAP, BLM, US Fish & Wildlife Service, Pima County regarding Tucson Mountain Park and the National Parks Service.
 - The commitment to prohibiting interchanges for over 10 miles in sensitive areas (from Snyder Hill to Manville Road) is another example of this coordination.
 - The route was modified to provide consistent wildlife corridors for I-11 with the CAP Canal to enable and improve wildlife movement.
- Concern regarding impact on habitat can be mitigated but not articulated in the report.
- I-10 build out is not a realistic solution:
 - While it's understood that this is a Tier 1 study, the level of detail for the orange (I-10) alternative is inadequate, as the report does not identify whether the proposed addition of 2-3 lanes on I-10 will be accomplished by tunneling, double decking, or removing the frontage roads. Yet the cost for this alternative is estimated at \$586M. This seems low by an order of magnitude. As examples, just the reconstruction of a handful of miles of I-10 for the Broadway curve in Phoenix cost \$500M. Here ADOT Would need to rebuild over 40 miles of I-10 through an urban area. The recently completed Ina Traffic Interchange cost \$120M with a high portion of the cost being associated with property acquisition/mitigation. This alternative includes over 25 interchanges in more urbanized areas of Tucson.

- Fails to provide an alternate option for north/south traffic flow resulting in a single point of failure for traffic.
 - Tucson is the only major city on I-10 in the nation that does not have an operational bypass. The I-10 route to Phoenix from Tucson is often brought to a halt by accidents. An alternate interstate route to Phoenix is needed. 2010 ADOT studies have found that I-10 is constrained to a maximum of 8 lanes from Prince Road to Alvernon Way with no opportunity for widening; only option in that section would be to tunnel under or double-deck and cost and impact of such efforts was not adequately broken out in the EIS
 - The report does not breakout the options for use of I-10; stackable segment, widening, etc. It needs more detail.
 - Assessment must include better cost numbers for the possible route through Tucson.
 - Historic sites alongside I-10 cannot be avoided or mitigated
 - Conclusion of EIS is “the I-10 route through Tucson is not mitigatable.”
 - No details provided allowing uninformed speculation as to how I-11 “CAN” work along I-10 through downtown Tucson
 - No information provided as to the economic and environmental impacts on the neighborhoods, commerce, and circulation along I-10.
 - It would not provide any travel time savings (or associated trade/logistics benefits) between Nogales and Casa Grande compared to the no build alternative (Figure 2.13).
 - The operation and maintenance cost for this alternative are \$10B higher than for the recommended alternative. These represents long term costs that will preclude/limit other ADOT investment in Southern Arizona.
 - It's contrary to the current best practices for transportation and land use. Cities across the US are removing double deck freeways, not building them, because they divide the communities they traverse.
 - There is no assessment of how many properties would be affected by this alternative, or the loss of revenue by businesses acquired/relocated as a result of the I-10 widening.
 - The expansion of I-10 through downtown “core” of Tucson would negatively impact those within the lowest quintile of socio-economic status, as well as impact significant industrial/commercial areas
- No Build is not an option:
 - Increasing trade with Mexico requires additional trade route capacity
 - International trade with Mexico for Arizona alone is over \$3 billion.
 - Commercial truck traffic through the Mariposa port of entry is growing at a rate of 3% per year.
 - Tourists still have the option to come up I-19. Trucks do not stop but have the option if they want to.
 - 2008 ADOT Study states inability to bring more traffic through downtown Tucson. So now **two** reports by transportation and environmental experts factually support that conclusion.
 - A no build option would place Arizona at significant disadvantage to Texas as an entry point into the U.S. marketplace.

- Increased congestion in the downtown area as predicted in the 2008 ADOT study is detrimental to attracting new employers as travel time is an important selection factor
- I-11 business case was justified on International Trade. In the No Build analysis, how does the financial model work for I-11 if it does not connect to the Border?

III. Questions/requests that could be included in comments: Estimated costs in the draft EIS of section B (orange alternative) are insufficient and need to be further expanded, breaking out the costs of the alternatives within the section passing through Tucson; widening, tunneling and double decking.

- No direct statement exists of the total cost due to lost trade with Mexico as a result of the no build option. This analysis should be added to the report.
- Inaccurate declarations and claims made during this process of the number of homes and “hundreds of thousands of acres” impacted will need to be addressed in the EIS.
- No clear assessment of the economic impact yet the major purpose for which the I-11 business case was justified is International trade. What was the primary purpose of creating I-11? International trade. The report should discuss the economic impact of the increased trade that would be enabled by I-11.
- What facts in the report support the I-10 alternative proposed by many?
- Need to add more detail on the impact to neighborhoods and businesses if the orange/I-10 option is selected.
- How many home sites are within the recommended 2000’ swath in Pima County and how many would potentially be included once the route is reduced to 400’?
- In the Amado option going northwest, how many Sahuarita homes would be saved?
- What is the incremental mileage to implement the El Toro option versus the Amado Option?

To Whom It may Concern

I urge you to keep our Beautiful Desert Beautiful,
and Natural. Our West Desert and our Desert
Museum & Old Tucson are Two of our Treasures
and there are so many more (like Gates Pass Viewpoint)
and these would be Destroyed by putting an
Interstate Right next to them. This new
Freeway needs to be part concurrent with I-10
to preserve our Beautiful West Desert!

Thank you

Donald R. May
DM

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

Dear Sir or Madam:

At the presentation in Buckeye for this Study, one of the mitigation areas itemized is that of 'noise'. That is of concern to me and to my neighbors. We have recently moved to a 55+ community called CantaMia. It is at the edge of Goodyear. The maps show that if the blue or purple alternatives are selected, the highway would come within approximately 200 yards of our brand new homes. These home sites were selected because they are so far out of the city that we can enjoy virtual silence. We hear birds, breezes and occasional coyotes, but do not hear motor and commercial noises.

The green option would be a little better as it is further away from CantaMia but the optimal option seems to be the orange option. It is the best option for two reasons. First, as mentioned, it is farther away from this and other new residential areas. But equally important, and would be important for financial interests, is the fact that it follows roadways that are already zoned and existent. The fact that it would include SR-85, which in many places is already a divided four-lane highway, and I-8, which is already built, would reduce the cost of new highway considerably. It would also interconnect nicely with San Diego, CA, as well as Tucson, AZ.

Please consider these options.

Sincerely,

A handwritten signature in cursive script that reads "Harriet R. McDonald".

Harriet R. McDonald, Ph.D.
18205 W. Cedarwood Land
Goodyear, AZ 85338

HARRIET McDONALD

18205 W. CEDARWOOD LANE
GOODYEAR, AZ 85338

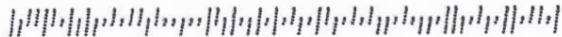
PHOENIX AZ 852

01 AUG 2019 PM 4 1



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

85007-327999



6/24/19 Comments on Proposed I11 route and EIS pertaining thereto

The original issue was improvement in use of surface roads for trade and national security. The current proposed route cuts through open, environmentally essential land west of Tucson rather than following the current transportation corridor or I19 and I10.

This appears to be short-sighted as land, businesses and existing roads already configure around that already-established corridor. Why bring all the adverse environmental exposures to ecologically necessary habitat when citizens already have adapted to them for the existing corridor? People do not want to own homes or build next to the current interstates but they DO want to live and build out in the areas through which the I11 alternative is being proposed.

Also the MUCH better alternative and likely MUCH less expensive plan would include diverting much of the individual car traffic between Nogales-Tucson-Phoenix by light RAIL and then as needed widen the current routes of I10, I19.

Please, please do NOT build I11 out into open land thus irreparably harming its essential nature so critical to ALL of us when land, strategies of utilization are already in place for our current routes?? This makes NO sense to eliminate one of the key attributes which draws people to our region – the open space, national and international treasures of natural ecosystems. Basically this choice would thus eliminate one of the big causes for needing increased surface transportation – people choosing to visit, live, work here. This makes no sense!

I live here and knew about the Arizona-Sonoran Desert Museum, for one example, 40 years ago, even before I moved here. People come to that attraction from all over the world when they come to our state. National Geographic came to that region to our west when studying habitat and species of this ecosystem.

Destruction of its essential nature would ensure that choice would not be made again. So economically that I11 route results in a negative for our economy – degradation of the very reason for which so many choose to come here, and certainly when compared to choosing between Tucson and Phoenix!

Do NOT destroy the essential nature and gifts of our greater area – Tucson!

Sharon McDonough-Means MD 520-321-4695 mcdosh@dakotacom.net

To whom it may concern,

With sadness I write this comment, my house is in a land of 2.5 acres and we are three families who share it. Unfortunately, our homes are in the middle of this I-11 project, so we are at risk of losing what we have built in 42 years. I wonder if those in charge of this corridor have a little awareness of what it means to lose a home Maybe in the mentality of wealthy people there is not even the possibility of thinking about it, it is sad, true?

All the families that live here, most of us we are us citizens and we feel discriminated because those who want this project do not take into account our voice or suffering that we are going through. Our houses are not garbage that needs to be destroyed.

This corridor will affect, not only our homes, it will also affect the Saguaro National Park West and wild life, Sonora Desert Museum and even more, CAP, that would put at risk the water that is distributed to the city ... so, why not to look for other alternatives? Or ... Is because is it more important for you to spend an extra 3.7 billion dollars than to consider us as people?

Governor Ducey, and Representatives, please listen to our voices.

Thank you

We know that authorities of ADOT has in mind to build a new route to divert traffic that passes through the City of Tucson, Arizona. The idea is not bad, the problem is the alternatives they have in Avra Valley.

If you decide to build it over the Avra Valley Area where is a large population of houses, many of them will be destroyed, including mine. This road will also affect the natural environment that surrounds us here, the Saguaro National Park West, the National Desert Museum, Ironwood Forest, the animals that lives here and CAP that collects the water from the State of Colorado that will affect the City of Tucson too. Why is so attractive to build it in this area? ...is because it will cost \$ 3.4 billion dollars more? Tucson Needs their streets to be fix them why you don't use the money for that reason?

We know also that this process has already begun to affect us because our properties have already been devalued and we do not know how much more. How is it possible that you as authorities do this to us as us citizens? And sadly, many of those who live here have been for more than 50 and they are already retired and many more are close to retire to... how are they going to move too?

... I am a 54 years old, and my husband 55, I just got my certificate as a teacher last October (2018)... how do you think we are going to start with a mortgage? we will be renting an apartment with the salary we have, and what about the people with dogs, cats, horses, sheep, chickens? If this happens, my husband and I will have to take our dogs (2) to the Human Society because we will not be able to keep them, I hope in God he can move your hearts and let you understand how much pain as a PERSONS we are going through right now.

Our house is not fancy, but is clean, organized not trashy at all. My husband and I we have been working every weekend for the last 10 years taking care about our sanctuary. How much time invested and money for this? We sacrificed going out or vacations because we wanted our house to look better. And how many more did the same?

Please, we are humans!!!, don't play with our securities, we don't make the money you do... My sleep is affected, and several nights I wake up thinking: "Are we going to be able to stay in our house or not" or "for how long"? Yes, I am stressed, depress and I have being crying too. This is not fair, to have a house is a big security, please, please, I beg you, don't destroy it!

Graciela Arce McGuinness, Tucson, AZ, USA.

Mike and Lori McLean

21875 W El Grande Trail
Wickenburg AZ 85390
702-672-0317
lclark702@aol.com

May 1, 2019

I-11 Tier 1 EIS Study Team
1655 W. Jackson St.
Phoenix AZ 85007

To whom this may concern;

Hello my name is Lori McLean and my husband is Mike McLean. We live in the Vista Royale subdivision west of Wickenburg. I am writing to you in response to the I-11 Draft Tier 1. We attended the meeting in Wickenburg AZ on April 30, 2019. Thank you for giving us that opportunity.

We have many concerns and recommendations about the route location you are proposing. Vista Royale Subdivision is located approximately 6 miles west of Wickenburg. It is a very nice and peaceful subdivision with clean yards and paved roads. We have CC&R's to maintain this beautiful exclusive neighborhood. The majority of the residents are between the ages of 60 and 80. Most of us are still working to stay ahead. There are several horse zoned lots here as Wickenburg is a very popular equine destination. We enjoy miles and miles of state land horseback riding and hiking trails on the state land that backs up to this subdivision.

Our concerns are if the Corridor 11 is approved for the current route, we will have noise pollution, air pollution, trash, and a SEVERE decline in property values. The proposed alternate route shows that 3 houses against state land will be demolished. Even if we were to be offered fair market value it is a tremendous loss. As I stated above the age group of our residents would have a severe impact for everything we have worked all our lives for. Have you ever driven on a freeway that was clean and free of trash? Will there be mechanical breakdowns of the travelers that will lead to trespassing on our properties? The visual and aesthetics of this would be unbearable to look out our windows and see a block wall with cars and semi's at a high rate of speed. This pathway has a curve before it connects into Highway 93 creating exhaust brakes on the semi trucks that will be heard all hours of the day and night. Your engineering has stated that this route will accommodate speeds of 75 mph. Our property adjoins the state land on the west side where the Corridor 11 is coming thru. Looking at the map it is within feet of our property line fence.

As I sat and listened to the residents pleading their concerns with trembling voices none of us are in disagreement that the corridor 11 will have great benefits. We are in confusion as to why it is proposed to be in our back yards with so many miles and miles of empty state land.

There are 2 stock water tanks that our wildlife use that will be destroyed on this route. The cattle and sheep will no longer have water there. I have encountered desert tortoises several times at the water tanks and within several feet of my property line. The residents to the west of me have as well.

The desert tortoise is listed as "THREATENED" under the United States Federal Endangered Species Act and is considered vulnerable by the Internal Union for Conservation of Nature. (IUCN).

We would like to recommend that you please reconsider this route and go further west of us and maybe even close to state route 71. It is noted that you are trying to avoid the potential to impact existing development. The proposed route is a definite impact of this development. We are 100% confident that if any of you were in our position the same fears would be present.

Thank you for including us in this project and we sincerely hope you will consider our concerns and that we can come to agreement that this is clearly not acceptable.

Lori and Mike McLean

Mike and Lori McLean

21875 W El Grande Trail
Wickenburg AZ 85390
702-672-0317
lclark702@aol.com

May 3, 2019

To Whom This May Concern;

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Thank you for including us in this project and we sincerely hope you will consider our concerns and that we can come to agreement that this is clearly not acceptable.

Best Regards,

Lori and Mike McLean

McWilliams, M
July 1, 2009 P3535

To Concerned Parties,

I'm writing a short statement expressing my protest to the proposed highway route. As a former and long time resident of Picture Rocks I developed a deep love and understanding of the valuable wildlife populations of the area. It's my opinion, based on my knowledge of the facts of this rich but fragile need for ecosystem survivability, that ANY further man made intrusion into this area should be avoided.

I suggest any alternative to this route as this one is obviously the most damaging. Thank You for your consideration in my opinion.

Michael L. McWilliams
MICHAEL L. MEWILLIAMS
1609 N 5th Ave
Tucson, AZ.
85705



July 8, 2019

I-11 Tier 1 Study Team
c/o ADOT Communications
1644 W. Jackson Street
Mail Drop 126F
Phoenix, AZ 85007

RE: I-11 Tier 1 Study Comments

Dear Tier 1 Study Team:

The Tucson Metro Chamber's mission is to champion an environment where business thrives and our community prospers. On behalf of our 1,500 member businesses and their collective 120,000 employees, the Chamber commends the Arizona Department of Transportation for the foresight to have Interstate 11 planned "border to border." The future economic growth expected from this important connectivity sets our state, and specifically our region, to remain an integral part of international commerce for decades to come.

The Chamber **strongly opposes the No Build Option** within the I-11 Tier 1 EIS, and **supports the Recommended Corridor Alternative** put forth in the Tier 1 EIS document. The detailed engineering, environmental process, as well as the extensive public outreach that occurred in the process, conclude this is the correct alternative for the Southern Arizona portion of Interstate 11.

Our support for the Recommended Corridor Alternative is based on our long-standing belief in economic development spurred by adequate transportation corridors, along with planning for the future. Previous studies have recommended a true alternate route avoiding the congested metropolitan area, providing an alternate route for north-south traffic to and from Mexico. The Recommended Corridor Alternative provides relief to our existing transportation network, ensuring future surface transportations demands will be met without inadvertently or unnecessarily harming our existing climate for commerce. The proposed route would serve as a major trade corridor, relieving long-distance-haul trucking traffic from I-10, potentially saving the need to widen I-10.

However, there are still areas we would like to see emboldened or explored as this process continues:

- We would like to know the impact of an I-10 interchange in northern Pima County, as well as continuing as a separate Interstate through Pinal County. The



current study has these options as separate, and we believe there may be substantial benefit of both options being considered.

- Further expansion on the ability to mitigate a variety of environmental concerns expressed in public hearings
- Enhanced detail on the limited access points (interchanges; ingress/egress) north of Arizona State Highway 86 to Marana Regional Airport
- The level of detail for the alternative using the current I-10 (orange alternative) is inadequate. Further details on the proposed expansion need to be included. The estimated cost for the expansion seems unrealistically low for significant modifications to the existing 30-mile roadway.
- Tucson is the only major metropolitan region on I-10 in the nation that does not have an operational bypass. The I-10 stretch between Phoenix and Tucson is often brought to a halt by accidents. The Tier 1 report should include information on the occurrence of the significant events in the previous decade.
- No direct statement exists of the total cost due to lost trade with Mexico as a result of the no build option. This analysis should be added to the report.
- Accurate number of homes and lands impacted for both the 2000-ft. width, and an estimated amount of the same for the 400-ft. width, need to be addressed in the final report.

We appreciate your consideration of these points and we hope to discuss these issues and more as the Tier 1 final EIS comes to fruition.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Medler", is written over a light blue horizontal line.

Robert Medler
Vice President



July 8, 2019

I-11 Tier 1 Study Team
c/o ADOT Communications
1644 W. Jackson Street
Mail Drop 126F
Phoenix, AZ 85007

RE: I-11 Tier 1 Study Comments

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A handwritten signature in black ink, appearing to read "R. Medler", is written over a light blue horizontal line.

Robert Medler
Vice President

Helen E. Mellen
11500 W. Sinagua Road
Tucson, AZ 85743

July 7, 2019

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

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

To whom it may concern:

I would like to formally protest the "recommended Alternative Route described in the Tier 1 DEIS for Interstate I-11", specifically where it cuts through the Avra Valley west of Tucson.

I do not understand why, in spite of overwhelming opposition voiced by many agencies, groups and individuals for many years against an interstate highway through the Avra Valley, this route continues to be the recommended route. There are so many reasons why this should not be the preferred route and why enhancing the I-10 and I-19 (Option "A" and "B") infrastructure would be the much better choice.

Some of the reasons for protesting the "recommended Alternative Route" are as follows:

It would negatively impact public lands, including: the federally held Saguaro National Park West, Ironwood National Park, and the Tucson Mitigation Corridor (owned by the Bureau of Reclamation and managed by Pima County); Pima County lands such as Tucson Mountain Park and open space properties purchased and protected under Pima County's Sonoran Desert Conservation Plan and Section 10 Habitat Conservation Plan; Tribal lands owned by the Pascua Yaqui Tribe and the Tohono O'odham Nation. It would also pose a threat to the City of Tucson's water supply.

It would negatively impact Wildlife Corridors by severing important wildlife passages between the Tucson Mountains and Ironwood Forest National Monument and the Waterman Mountains and by directly crossing through the Tucson Wildlife Mitigation Corridor that was created as a mitigation for impacts to wildlife corridors by the construction of the Central Arizona Project Canal. As someone who has lived adjacent to the Tucson Wildlife Mitigation Corridor for over 27 years, I can testify to the abundance and variety of wildlife that use the corridor for crossing and for habitat.

It would cause noise, air, light and view pollution which would negatively impact public and private lands, including a protected wilderness area in Saguaro National Park. It would negatively impact scientific research at Kitt Peak Observatory by increasing night lighting and compromising the ability of scientists to conduct their research. It would cause Urban Sprawl west of the Tucson Mountains, destroying the pristine Sonoran Desert and the rural character of the valley.

It would negatively impact the economy of the area from the border to Casa Grande: It would cost \$3.4 BILLION more to build the Recommended Alternative Route than it would to co-locate I-11 with I-10 and I-19 through the

Tucson Region (according to page 2-33 in chapter 2 of the DEIS), which I would think would make the Recommended Alternative Route a No Starter right there. It would cause economic loss to Tucson by diverting traffic away from Tucson's newly revitalized downtown and growing business districts. It would lead to negative economic impacts to tourism powerhouses such as the Arizona-Sonoran Desert Museum and Saguaro National Park West, among many others. It would lead to far-flung sprawl development in the Avra Valley, creating a whole new need for costly east-west transportation options and other services. (The fact that this route continues to be brought up by ADOT leads me to think that the development of the Avra Valley and the subsequent enrichment of a few people and groups must be the underlying reason for wanting to put the freeway here in the first place.)

It would negatively impact private property by encroaching on the private property rights of thousands of private property owners along its entire north-south length, lowering property values and destroying the rural character of lands in the Avra Valley, in Picture Rocks and in other areas in Pima County and with areas north.

While all of these and many other concerns would point to the logical conclusion that the Recommended Alternative Route through the Avra Valley should be scraped once and for all and that co-locating I-11 along existing I-10 and I-19 corridors would be preferable, I have my own very important and emotional reasons for wanting I-11 to NOT go through the Avra Valley. My husband and I have lived on Sinagua Road, bordering the Wildlife Mitigation Corridor for over 27 years. This area is pristine Sonoran Desert with abundant wildlife, mature saguaros and ironwood trees and unbelievably gorgeous views in all directions. We built our own home here and live in harmony with the desert and the wildlife that lives here. We, as well as our neighbors in the area would be devastated by a freeway through this special place not just because of the loss or devaluation of our homes but also because of the destruction of this irreplaceable, beautiful desert. I am attaching a file that shows what it really looks like here, versus what it looks like on ADOT's map of the route. I am also attaching a list of some of the wildlife that we've seen over the years (by no means a complete list of everything we've seen) with a file of some of the wildlife we see routinely here. That file includes a short video clip of a badger, which we've only seen once in all the time we've lived here, just this past April.

Thank you for considering my points and for entering my protest in the public records. I am hopeful that reason will prevail and a less costly route that truly meets the needs of the project will be selected.

Sincerely,
Helen E. Mellen
11500 W. Sinagua Road
Tucson, AZ 85743
(520) 437-6644

Attachments (2)







CRITTER LIST	11500 W. Sinagua Road 1992 - 2019					
CRITTER	BIRDS	REPTILES	MAMMALS	AMPHIBIANS	INSECTS	NOTES
Javelina			X			
Giant Toads (Sonoran Desert)				X		
Bats			X			one on wall 9/2008
Jack Rabbit			X			
Jack Rabbit Baby			X			Living under cooler 7/2009
Cottontail			X			
Sidewinder		X				
Tarantula					X	
Gila Monsters		X				Early 90's; 7/2008; 7/2018
Centipede					X	
Vulture	X					31 at once in 1999
Wolf Spider					X	
Horned Lizard		X				
Wood Pecker	X					
Zebra Tail Lizard		X				
Blind Snakes		X				
Deer			X			With Antlers
Coyote			X			
Gambel's Quail	X					Lots
Round-Tailed Ground Squirrel			X			
Harris's Antelope Ground Squirrel			X			
Geckos		X				
Regular Squirrel			X			
Harris's Hawk	X					
Western Diamondback		X				Every year
Blue Headed Lizard		X				
King Snake (Gopher Snake?)		X				
Black Shiny Snake						In a tree
Desert Tortoise		X				93, '97, '99, '03, '09
Pack Rat			X			
Mouse			X			
Kangaroo Rat			X			
Pocket Mouse			X			
Hummingbird	X					
Great Horned Owl	X					
Whiptail Lizard		X				
Curious Bird (Dusky Warbler?)	X					
American Kestrels	X					Mating pair
Spadefoot Toads				X		
Bark Scorpions					X	
Giant Hairy Scorpion					X	
Pyrrhuloxia	X					
Phainopepla	X					
Skunk			X			Smelled only
Verdin	X					
Screech Owl	X					
Gopher Snake		X				Eating a rat
Black Whipsnake		X				Eating a baby rabbit
Spiny Lizards		X				
Pygmy Owls	X					
Variable Sand Snake		X				Tiny, red & black banded
Shovel Nosed Snakes		X				
Gnatcatchers	X					
Swallows	X					
Bobcats			X			Many times over many years
Bobcat Kittens			X			2006; 2019
Desert Iguanas		X				
Black Throated Sparrows	X					
Pigeon!	X					1st & last: 3/2010
Say's Phoebe	X					
Gray Fox			X			one in back wash Jan 2010
Gray Foxes			X			2 hanging out in ironwood tree 11/2013
Mule Deer			X			
Glow Worm (3/4")					X	Very Bright; 8/2015
Gopher Snake - Baby		X				10/2015
Western Tanager	X					
Deer			X			BIG, being chased by a coyote!
King Snake Baby		X				8/2016...In the house! (black & yellow)
Desert Iguana - Babies		X				8/2017
Gopher Snake - Baby		X				8/2017 - on window sill
Crested Caracaras	X					2 - Near Sandario & Mile Wide Rd.
Harris's Hawk Family Group	X					ongoing from 4/2018 - now
BADGER			X			4/22/19 captured on wildlife camera
Dark Tree Lizard w/blue underneath		X				6/24/19; mated with regular brown tree lizard
Baltimore Oriole	X					
Gambel's Quail Egg Clutches	X					6/2019: 1 near house; 1 near garden
Walking Stick					X	

As an Avra Valley property owner, I strongly oppose the proposal to build I-11 through the Avra Valley west of Tucson. If the highway goes through, it will completely ruin one of the few areas of greater Tucson not yet affected by urban sprawl, destroying desert fauna and flora and filling a relatively pristine area with noise and pollution. Besides destroying the beauty and serenity of the desert, it will force many Avra Valley homeowners to lose their homes and property. The Avra Valley route seems vague and poorly thought out, ignoring the will of more than two thousand local residents who signed petitions opposing the idea and threatening Saguaro National Park, the Desert Museum and other staples of Tucson tourism, so important to the area's economic vitality.

In short, I believe this route is destructive, unnecessary, and extremely harmful to people, animal life, and the beauties of the desert. If I-11 must be built, please find another route or build nothing at all.

https://www.gvnews.com/news/residents-want-more-town-dialogue-on-i--plan-in/article_b44fc0ce-8e2a-11e9-939d-2f8761f1b8f5.html

FEATURED

Residents want more town dialogue on I-11 plan in Sahuarita

By Jorge Encinas jencinas@gvnews.com Jun 15, 2019

Sahuarita residents opposed to a plan that could bring an interstate through the west part of town say they're having a tough time getting the attention of local leaders and want the community to have a bigger voice in the decision.

The plan, which likely wouldn't come to fruition for 20 years, if ever, would connect the proposed Interstate 11 with I-19 at El Toro Road just north of Anamax Park. It would be part of a highway system connecting Mexico to Canada.

Jan McClellan and Dorian Dodson live within the recommended corridor's path in Sahuarita, west of I-19, and represent a group not happy with what they see as a lack of transparency on the part of the town and a failure to publicly engage with residents who are concerned about what the new interstate would do to Sahuarita and Southern Arizona.

Farther north, the plan also is meeting with opposition. During a May 8 public hearing in Tucson, groups from Avra Valley showed up to voice their opposition. Like the Sahuarita residents, the recommended corridor would pass through the rural community and residents are worried it would permanently alter their way of life.

The I-11 corridor

The recommended corridor is a 2,000 foot-wide study area stretching from Nogales to Wickenburg. The I-11 project is part of the Canamex corridor that would open a transportation route from Mexico to Canada and is intended to facilitate trade among the three countries. At times, the route would share an existing road, such as I-19 south of Sahuarita.

The Tier One study is in its final stages with public comments being collected before the Arizona Department of Transportation and Federal Highway Administration makes a final decision. That decision is whether to use the current recommended route as the preferred route or not build at all. The public comment period ends July 8.

A future Tier Two study would reduce the 2,000 foot-wide corridor to a 400-foot roadway. There is currently no funding or timeline for that study. Any potential construction would not occur for decades and would only begin if or when a need for more highways was determined.

ADOT held six public hearings earlier this year — Buckeye, Wickenburg, Casa Grande, Marana, Tucson and Nogales — and added what it called an "information session" in Green Valley. ADOT spokeswoman Laura Douglas did not specifically address repeated questions about why a hearing was not held in Sahuarita, which would be directly affected by the proposal.

Residents concerned

McClellan has been a Sahuarita resident for 17 years, Dodson has lived here two years. Both think now is the time to take action, while the route is being determined.

Their group of residents is concerned with the impact a new interstate would have on the desert scenery and wildlife in the open area west of Tucson and the effects on Sahuarita.

Dodson said the corridor will transform the town from a unique and special community and turn it into another town with freeways cutting through it that bring problems of their own.

"Which includes more gas stations, more business that cater to truckers and other people transporting goods as opposed to catering to people who are enjoying the lifestyle and a very lovely community that is oriented towards family, towards nature, towards culture and will turn it into another town along the freeway," Dodson said. "And we've all seen what those look like."

Mayor Tom Murphy favors the proposed interstate because he said it's important to stay ahead of growing needs.

Murphy pointed to how roadwork on I-19 sometimes leaves a single lane open, causing delays and congestion. Fast forward to 2040 or 2045, and with population and traffic increases, the problem grows, he said.

"I don't think the no-build alternative would be the correct way to go," Murphy said. "Just getting behind on transportation corridors, I just don't think as a country or a region we always do a great job keeping up in front of what the needs are until it kind of hits a crisis point. I also think it's important to have the least amount of impact."

McClellan is worried that putting a freeway through the west side of town would damage a long-established part of Sahuarita, and farther north.

"To run a freeway through would add noise, light, emission pollution to not just the people whose homes may be affected by having to clear it, but also those surrounding the area for quite a distance," she said. "We're concerned also where that route goes in terms of when it goes over through the beautiful desert areas of the Saguaro National Park, the Desert Museum, the Ironwood Forest National Monument. All of those are areas of concern too because we love those areas."

Murphy said that while impacts should be minimized, change is nevertheless inevitable.

"We're celebrating our 25th year incorporating as a town and that was almost a 50-50 split at the time," Murphy said of the public vote to take that step. "It's always a tough call because roads will change a community. How we are at 30,000 (population) is obviously different from how we were at 2,000 people around incorporation time, but I think we've done a good job working with our partners to manage that growth and I wouldn't see this as any different."

Residents want action

McClellan and Dodson said they have been trying to arrange a meeting with the town with no luck.

McClellan tried to have I-11 added to the Town Council's May 28 agenda but was unsuccessful. Town Manager Kelly Udall contacted her to arrange a meeting but it didn't happen because of a scheduling conflict. McClellan, Dodson and two others attended the May 28 council meeting and voiced their concerns during call to the public.

Another meeting with Udall, Murphy, the town engineer and Jay Van Echo, ADOT's project manager for I-11, was scheduled for June 11. It was later canceled and conflicting reasons were given. A Sahuarita spokesman said ADOT canceled over "timing conflicts." ADOT told the *Green Valley News* the meeting was canceled because it was intended to be between town officials and ADOT without members of the public present. The meeting was canceled shortly after McClellan, who was invited by the town to attend, asked ADOT to allow a reporter from the *Green Valley News* to be present.

After the June 10 Town Council meeting, McClellan and Dodson said they asked Udall again to hold a meeting for residents to speak with the town and have their concerns addressed.

"It was after the meeting that we went up and tried to convince (Udall) to still hold the meeting with the mayor, the engineer and himself with us, but he wouldn't do that," McClellan said. "He just said they can't without an ADOT person, but he didn't say why they couldn't."

McClellan said they were also told by Udall that the I-11 issue could not be put on the agenda without an ADOT representative present. Dodson said Udall told them that I-11 was not their jurisdiction since it is an ADOT project and that they have nothing to do with it.

"I would characterize it as mystifying," Dodson said. "Just perplexing and mystifying that something so important cannot, would not be discussed with people within a community who are interested in it and see it as very important."

Udall declined to speak with the *Green Valley News* about I-11.

The town has confirmed that discussion on the I-11 corridor will be on the June 24 Town Council agenda. Udall has also confirmed the agenda item with McClellan by email. Murphy said there are a few things he hopes residents take from the meeting.

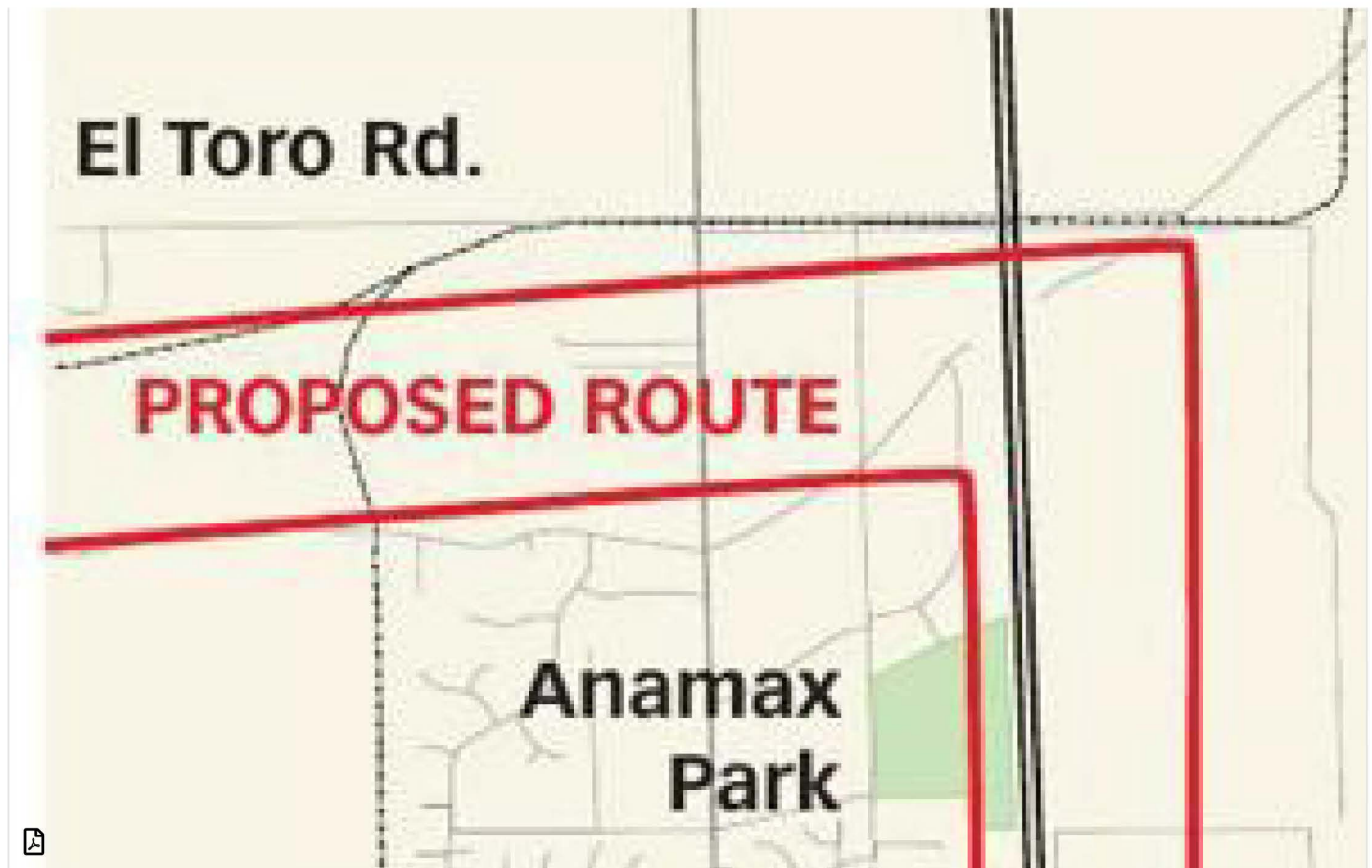
"One, I want the residents to know that they're being heard," he said. "Two, to hope they keep it in context what a Tier One is and when they would move to a Tier Two and move to construction. So how that could be an ever-changing landscape. But for me, it's kind of hard to weigh in when they're still working through their initial process."

McClellan and Dodson also want to see more transparency from the town going forward. They were unaware until shown by a reporter that the town had sent a letter signed by former public works director and town engineer Sheila Bowen to the Highway Administration in 2016 expressing support for I-11 and an El Toro Road connection. (Read the letter at gvnews.com.)

McClellan and Dodson want the the town to oppose the I-11 project despite officials having already given its endorsement with a connection at El Toro Road.

"I bet if we took that letter and showed 100 citizens out there that they would have no idea that the town has officially endorsed it," Dodson said. "So while it does represent the town, I don't think it represents the sentiments of the residents of Sahuarita."

Jorge Encinas | 520-547-9732

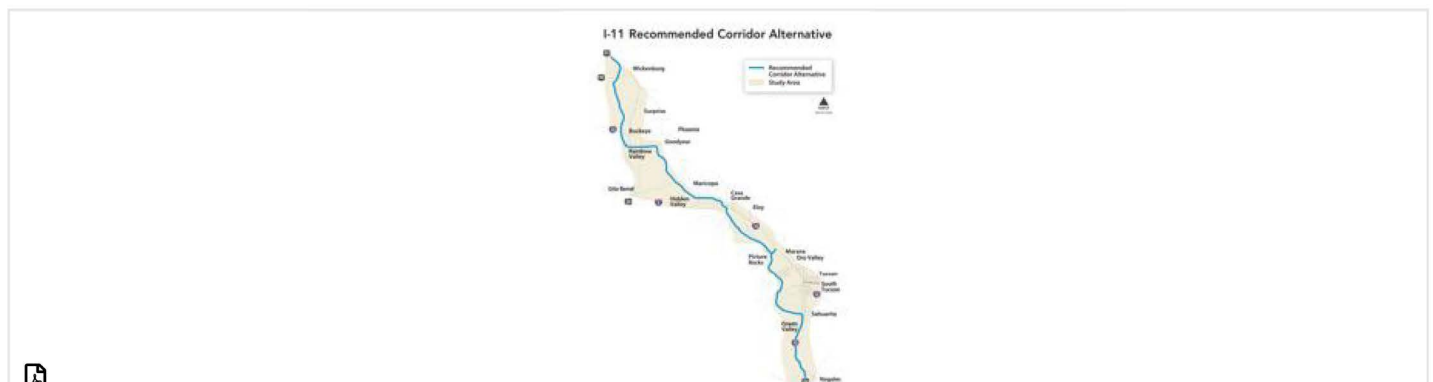


Proposed I-11 route

Jun 15, 2019

Sahuarita endorsement 0.00 KB

[Download FILE file](#)



Recommended Corridor Alternative

Jun 15, 2019

Learn more

Find the I-11 study, maps and make public comments at origin.i11study.com.

Public comments can also be made by:

- Phone: 1-844-544-8049
- Email: I-11ADOTstudy@hdrinc.com
- Mail: I-11 Tier 1 EIS Study Team c/o ADOT Communications, 1655 W. Jackson Street Mail Drop 126F, Phoenix, AZ 85007

Town Council takes a second look at I-11 after crowded meeting

I-11 Comments - June 30, 2019

To Whom it Concerns:

I have lived in Picture Rocks for over 20 years. This is such a unique and beautiful area. The thought of this I-11 Alternative is just sickening. Very important to me personally is the impact it would have on our quality of life out here. It will destroy the rural character of this area as well as negatively impact all of the incredible flora and fauna that this area is noted for. Impacts to our property values are worrisome as well.

It will severely and negatively impact Tucson treasures such as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Arizona-Sonora Desert Museum and Kitt Peak. This is pristine desert. If tourists look to see what they should not miss when visiting Tucson, these are the exact places at the top of that list. So, the I-11 would not only be destroying incredibly unique habitat, but at the same time destroying what makes Tucson "Tucson". Tourism would definitely be negatively impacted.

It goes against the County's Sonoran Desert Conservation Plan. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn. It would destroy sensitive habitat for many unique species that are protected by the Conservation Plan.

The increase in noise pollution, air pollution, and light pollution are all very real concerns. Right now, we can see the Milky Way and thousands of stars every night. You can't say that if you live in downtown Tucson. Why would we want to destroy an area that still provides this type of rural atmosphere? We also have very real concerns about an increase in Valley Fever due to disturbing large areas of the valley.

The City of Tucson has voiced opposition to this route as it places a freeway adjacent to the City's major water supply. We cannot guard against a toxic spill that would threaten Tucson's most vital resource. Vehicle emissions would result in Tucson Water's Avra Valley CAP settling ponds being affected and potentially threatening the aquifer also.

The recommended alternative route would cost \$3.4 billion **more** to build than co-locating I-11 with I-19 and I-10 through Tucson. It's irresponsible to suggest spending so much more money on this project when we don't have enough funds to properly maintain the roads we already have. It would

cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

It makes no sense that a route was chosen BEFORE an Environmental Impact Study was done. How in the world can you choose the best route environmentally when you have already thrown out all the possible alternatives before doing the study? Someone or some company is definitely trying to make themselves some money to the detriment of all of Tucson's treasures and the people who live in this area and love it because of its uniqueness and diversity.

We absolutely should not allow a planned private development, Diamond Ventures planned Swan Southlands development to take away the pristine desert and destroy our property values and our quality of life for this company to make more money! Shame on them! This I-11 proposal just makes no sense at all!

Each point I have listed above seems like enough to show this is a horrible idea. Put together it is absolutely unconscionable that this is being proposed.

Sandra Mitchel

5000 N Old West Road

Tucson, AZ 85743

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To: I-11 Tier 1 EIS Study Team
From: Steven Modrzejewski; Homeowner, Avra Valley Tucson, AZ
Re: Public Comment

June 7, 2019

Avra Valley is much more than just desert floor.

As regards building Interstate 11 through it, choose another option. There are a list of reasons to preserve Avra Valley, while there exists few if any good ones to build an interstate highway there. I would go so far as to say none. Compelling justifications for the I-11 path through this sensitive corridor are few and those that are, are suspect in my opinion. Public sentiment is soundly against it.

Rationale to circumvent Tucson in order to forge a faster, shorter route to Nogales, AZ is premature and ill conceived, even when granted undeserved deference to commerce, progress and growth.

Reasons not to build include:

- Irrevocable environmental damage
- Inadequate justification
- Contrived need
- Ostensible "evacuation route"
- Expense
- Economic loss to Tucson proper

The Avra Valley corridor is arguably a pristine treasure which would be damaged forever. Testaments of reverence include:

- The Arizona Sonora Desert Museum
- Tourism
- Wildlife ecosystem
- Saguaro National Park West
- Red Mountain Visitor Center
- Tucson City Water Reclamation
- CAP canal
- Tohono O'Odham Nation

To: I-11 Tier 1 EIS Study Team
From: Steven Modrzejewski; Homeowner, Avra Valley Tucson, AZ
Re: Public Comment

- Ironwood National Forest
- Kitt Peak National Observatory within sight
- A select area preserved and maintained in perpetuity

DO NOT route I-11 through this sensitive region because:

- The action is irreversible
- It degrades all, enhances little
- Creates light pollution
- Noise pollution
- Air pollution
- Particulate rain
- Interferes with wildlife migration and propagation
- Depreciates land and home values
- Displaces residents, most of whom would be unable to effect a comparable lifestyle elsewhere
- Invites graft, avarice and greed
- Ushers in untold gaudy highway businesses
- Is strongly opposed

Meanwhile, the looming prospect of a potential freeway discourages home sales and confounds homeowner decisions regarding property investments.

This unnecessary freeway takes much and gives little. Justification is lacking, but is nil for passing through the sensitive valley west of The Tucson Mountains.

Instead, enhance current highways or exercise the “no build” option. Any reservations about routing it closer to the City of Tucson are subordinate to God’s work in Avra Valley.

To: I-11 Tier 1 EIS Study Team
From: Steven Modrzejewski; Homeowner, Avra Valley Tucson, AZ
Re: Public Comment

About the sender:

- 68 years old
- Home stands in 2 proposed paths
- Arizona resident since 1970
- Tucson resident since 1973
- Vietnam Era Veteran 1970-73
- 22 years Vocational Counselor with AZ D.E.S.
- 40 years Masters level social work
- 26 years Avra Valley resident
- Retired
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This comment is in opposition to the Proposed I-11 Route. This proposed route that will bypass Tucson completely will harm the wildlife and natural beauty of the region but will have significant economic impacts for the Tucson region.

- 1) This recommended route will cost \$4 billion more to build then co-locating I-11 with I-19 and I-10. through Tucson.
- 2) This will impact Tucson's vital and precious water supply which has already been impacted by toxic spills which have led to Superfund sites in the region.
- 3) This would sever important wildlife corridors between Tucson Mountains and Ironwood Forest national monument and the Waterman mountains.
- 4) It will divert important business and consumers away from Tucson hurting the growing economy here.
- 5) The natural beauty of the region brings tourists from all over the world here and this highway will ruin the natural beauty they come to see.

Do not build this highway it is bad for the economy and bad for the environment

- Amanda Monray - Pima County Resident
~~Monray, Amanda~~



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

I AM NOT SURE OF THE ROUTE FROM NOGALES TO CASA GRANDE. BUT THE ROUTE FROM CASA GRANDE TO BUCKEYE WOULD BE BETTER WITH EITHER THE ORANGE ROUTE OR FOLLOW THE PREFERRED ROUTE FROM CASA GRANDE TO CHANDLER (PAGE 60 OF ATLAS MAP) FROM PURPLE TO GREEN THEN ORANGE.

Thank you

Contact Information (optional)

Name ARMAND MOOROIAN

Email mooraigs@aol.com

Address 18403 W. Verbena Drive

City Goulden, AZ

State AZ

ZIP 85338

Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact Laura Douglas, ADOT Community Relations Project Manager, at 602.712.7683 or ldouglas@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

有关中文信息, 请致电 1-844-544-8049.

CONTACT

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

EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S

i11study.com/Arizona



Moreno, J
I-2963



Cuddeback Digital Camera 4/26/06 7:32 PM Non Typical, Inc

July 5, 2019

RE: Recommended Alternative route described in the Tier 1 DEIS for Interstate 11

I am protesting the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11 west of Tucson.

I have been a resident of Tucson since 1981. I live in the center of the city, near Speedway and Stone Avenue, and frequently escape west over the Tucson Mountains to find beauty, tranquility and the precious habitat which once blanketed the greater Tucson basin.

The proposal would threaten protection of our federal parks and Tucson Mountain Park. It would be a blight for residents and tourists alike destined for the Arizona-Sonoran Desert Museum and Old Tucson. It would destroy the rural quality for the present residents and agricultural farms.

Therefore, I am opposed to the Alternative Route and hope another solution, even if more expensive in the short term, can be found to save this valuable area for many generations to come.

Sincerely,

Leona Mukai
1227 North 5TH Ave.
Tucson, AZ 85705

LeonaAZ@icloud.com



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

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- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

I am against the path (most recent) that I-11 is supposed to be constructed. It will literally be in my backyard. I am at Anway and Manville and have been there for 13 yrs. I moved out there to be away from the city. Noise, pollution etc. I'm so angry that my property value has drastically gone down in value. I'm sure that this is why, this project. There is a major gas line that runs across Manville Rd. which can't be built over. Funny how the most recent path runs right through city property. (Reservation Rd. & Manville Rd.) In addition, our water source will be compromised. All the wild life will be affected negatively. Our air will be polluted with diesel fuel which causes cancer. Totally against this path through Picture Rocks area.

Contact Information (optional)

Name Mary Mullen Email _____
 Address 4932 N. Buckmeister Way
 City Marang, Az. State Az. ZIP 85653

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有关中文信息, 请致电 1-844-544-8049.

CONTACT

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ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S

i11study.com/Arizona

To Whom It May Concern,

Although we are recent arrivals to Southern Arizona from the Southern California mess, our family has resided in Tucson for over thirty years. During that time, we saw the city more than double in size. We understand the need for change to accommodate new growth. Increasing commerce is the lifeblood of a community. The adage in business is if you aren't growing, you're dying. The same is true for a city, and Tucson is a perfect example. But, we can temper growth with conservation of our environment and culture. The Sonoran Desert is a delicate ecosystem of competing forces. Its inhabitants oftentimes live on the edge of existence dependent upon weather patterns and the degree of man's incursions. Take for example the residential and commercial developments north and south of the city. Whatever ADOT decides, someone will not be pleased.

We think the best route is the one which follows the current Interstate:

- Adding dedicated commerce lanes in each direction to the existing interstate nullifies the Tucson city council's argument of lost commerce.
 - We consider the argument negligible since commercial traffic is destination bound not locals looking for a restaurant or museum.
- The new construction could boost the appearance of downtown Tucson getting rid of overgrown vacant lots, boarded buildings, and squalid shacks.
 - It's surprising the City Council hasn't already done this.
- Adding lanes necessitates a reduction in the speed limit to 65 MPH in all residential areas-- Speed Kills.
- Commercial traffic would be restricted to dedicated lanes. Trucks and cars which break the rules would be severely fined.
 - The increased revenue could defray the cost of added law enforcement. Warnings are nice, but fines pay the bills.
- The environmental impact would be less than the other proposals since it does not destroy desert habitats.
 - A visit to Tucson's Desert Museum would convince any reasonable individual how ridiculous the other proposals are. Just because the land is vacant doesn't mean it's uninhabited.

Reading this you may think we're active conservationists, but that notion is far from reality. We are lifetime conservatives, long-time business owners, and educated seniors.

Sincerely,

John and Rita Muraski

To whom it may Concern;

This is very simple; you can relocate the highway and accomplish everything you need to do, and more cheaply, at that. There is no relocation or restoration of priceless natural beauty.

We only have one world.

It is our responsibility,

- 

John C. Murphy
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520-300-5770 (home)
312-401-8924 (cell)

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

Dear Study Team:

I am an ecologist and herpetologist with a long (1986-present) association with the Field Museum in Chicago. Five years ago, I moved to Arizona. During my career I have worked on tropical and temperate herpetofaunas in southeast Asia and the eastern Caribbean and the USA. You can find a list of my published papers at <https://fieldmuseum.academia.edu/JohnCMurphy>.

In this letter I want to express my concerns about the potential impacts of construction of a new freeway, the proposed I-11 through the Avra Valley, and the overall impact of the road on the environment and its wildlife.

The Sonoran Desert is a unique landscape and a national treasure as well as biological hot spot for plants and animals. The Avra Valley acts a corridor for wildlife movement, and it holds at least 15 species of vascular plants and animals considered vulnerable to extinction.

Construction of I-11 will add another north-south barrier for wildlife and further fragment the Sonoran Desert – well beyond what I-19 has already accomplished. Once the road is in place urban sprawl will spread along its length and widen the urbanized gap wildlife must navigate to move along an east-west axis. Many species are hesitant to cross even narrow roads and urbanized strips, this reduces gene flow, damages the natural landscape and creates another giant eye sore.

The only reason to approve this project is to make developers wealthier at the expense of a spectacular land scape and a healthy environment and give short term economic gain to a relatively few individuals. Its time to say no to the greedy and protect Arizona's natural heritage.

John C. Murphy

To whom it may concern:

7/7/2019

Murphy, J
I-3525

I'm writing to oppose the Recommended Alternative route described in the Tier 1 DEIS for Interstate 11. The landscape covered and bordered by this proposed route would be irreparably harmed by the introduction of a freeway and its associated impact.

This is a rare and beautiful stretch of land that supports more than simple economic growth. It maintains a balance of wildness, diversity of wildlife, sky darkness, and majestic character that is increasingly difficult to find and preserve. The cost to the cultural, natural, and community aspects of this region would be far higher than any economic benefit, especially since the cost of not co-locating the route with existing I-10 and I-19 corridors is so high. Please widen your focus and consider the broader impact. We are counting on you.

All the best,

Juliana Murphy
1347 E. 3th Street
Tucson, AZ 85719