# **Mailed Comments**



May 26, 2017

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

To the Interstate 11 Tier 1 EIS Study Team:

I am opposed to Interstate 11 routes C and D. Either one would be an environmental disaster for Southern Arizona.

There are significant recognized natural areas here, including Saguaro National Park West, Tucson Mountain Park, The Arizona -Sonora Desert Museum, Ironwood Forest National Monument, and the Wildlife Mitigation Corridor. These would all be negatively impacted by the various forms of pollution that would go along with either of these choices. Also affected would be the wildlife routes between the mountain ranges and water co-op wells and recharge basins. The world-class astronomy research facilities at Kitt Peak would be negatively affected. And the hundreds of residents of the Picture Rocks area and Avra Valley would face pollution of air, ground, water, light, sound and lifestyle.

Since there is the option of double-decking existing I-10, I see no reason to select routes C or D. There are economic, financial and time factors to support this.

Thank you for considering these concerns and saying NO to the Avra Valley routes.



(A copy has been sent by email)



May 30, 2017

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

Re: Interstate 11 Corridor, Tier 1 Environmental Impact Statement

Founded in 1952, the Arizona-Sonora Desert Museum is an economic driver for Pima County. The Desert Museum hosts about 350,000 visitors annually. The Museum is a fusion experience: zoo, botanical garden, art gallery, natural history museum, and aquarium. The mission of the Arizona-Sonora Desert Museum is to inspire people to live in harmony with the natural world by fostering love, appreciation and understanding of the Sonoran Desert. The Museum grounds comprise 97 acres, 85% of which are outdoors. There are 2 miles of walking paths, 16 individual gardens, 1200 native plant species, and 56,000 individual plants. The animal collection includes 230 native mammals, reptiles, amphibians, insects, and birds. The Museum was named #3 Zoo in the US in a USA Today Poll in 2017, #9 Museum in the US by TripAdvisor in 2014, and #5 Public Garden in the US by TripAdvisor in 2013. In 2014 the Museum won Tucson Lifestyle's Best of the City in two different categories: Best Museum and Best Local Attraction. Approximately 13% of the visitors to Pima County name the Desert Museum as the reason for their visit, higher than any other attraction. A key aspect of the visitor experience at the Desert Museum is being immersed in the natural beauty of the Sonoran Desert. The Trustees of the Arizona-Sonora Desert Museum have concerns about impacts of the proposed I-11 Alternatives C and D which would go through Avra Valley. If either of these alternatives is selected, there will be impacts to the Arizona-Sonora Desert Museum and to the Sonoran Desert region as a whole.

- Either alternative would impact the viewshed and visitor experience at the Desert Museum. Much of the Museum grounds are on a hillside facing the Avra Valley. The development of I-11 through Avra Valley may be fully visible from much of the Museum's grounds.
- The development of any alternative through Avra Valley would impact wildlife corridors and wild connectivity between the Tucson Mountain Park, Saguaro

  National Park, Ironwood Forest National Monument, the Bureau of Reclamation

2021 N. Kinney Road Tucson, AZ 85743-8918 Phone: (520) 883-1380 Fax: (520) 883-2500 www.desertmuseum.org Wildlife Mitigation Corridor, the Tohono O'odham Nation, the Santa Cruz River, and Avra Valley.

- Other effects from the freeway could include habitat modification associated with the proposed construction sites, vehicle emissions, roadway runoff, light and noise pollution, soil and water degradation, and the spread of invasive plant species like buffelgrass and Sahara mustard.
- Development may impact the visitor experience of being immersed in nature at both the Arizona-Sonora Desert Museum and Saguaro National Park, which create significant tourism dollars for the Tucson community.
- Construction of I-11 through Avra Valley does not appear to be consistent with the Sonoran Desert Conservation Plan, Pima County's award-winning plan for balancing the conservation and protection of our cultural and natural resource heritage with our efforts to maintain an economically vigorous and fiscally responsible community.

The Trustees of the Arizona-Sonora Desert Museum believe that Alternatives C and D through Avra Valley may directly impact the Arizona-Sonora Desert Museum and also may have considerable impacts on conservation lands in the Sonoran Desert. We urge the responsible authorities to give fair weight to all potential impacts and to use the Sonoran Desert Conservation Plan as a guide.





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

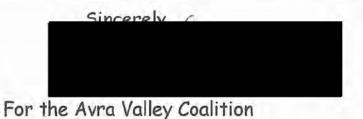
## VIA USPS PRIORITY MAIL

## Gentlepersons:

Enclosed please find 147 additional comments from residents of the Avra Valley to be given due consideration and included in the I-11 Tier 1 EIS record. All are opposed to any I-11 route through the Avra Valley and prefer a "No-Build" alternative or, if that is not feasible, Alternative B to expand the existing Interstates 10 and 19 corridors.

Most include email addresses for future notifications from ADOT.

After June 2 we would appreciate being told how many public comments were made in total at the various meetings, by mail, email, phone or online. We estimate that about 1,000 comments came from residents of the Avra Valley, overwhelmingly opposing those routes.





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

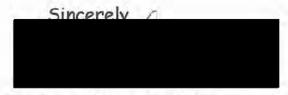
## VIA USPS PRIORITY MAIL

## Gentlepersons:

Enclosed please find 147 additional comments from residents of the Avra Valley to be given due consideration and included in the I-11 Tier 1 EIS record. All are opposed to any I-11 route through the Avra Valley and prefer a "No-Build" alternative or, if that is not feasible, Alternative B to expand the existing Interstates 10 and 19 corridors.

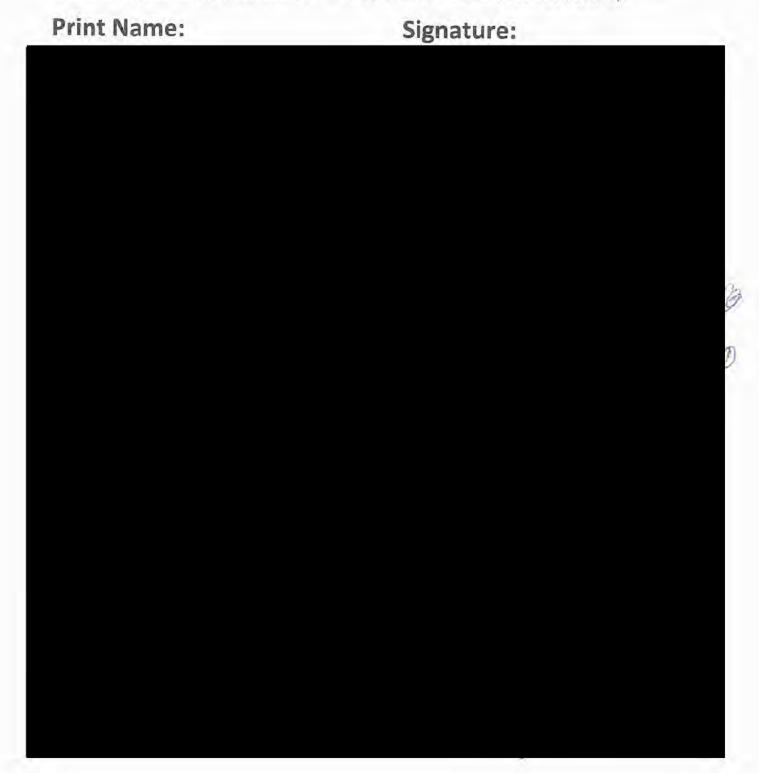
Most include email addresses for future notifications from ADOT.

After June 2 we would appreciate being told how many public comments were made in total at the various meetings, by mail, email, phone or online. We estimate that about 1,000 comments came from residents of the Avra Valley, overwhelmingly opposing those routes.

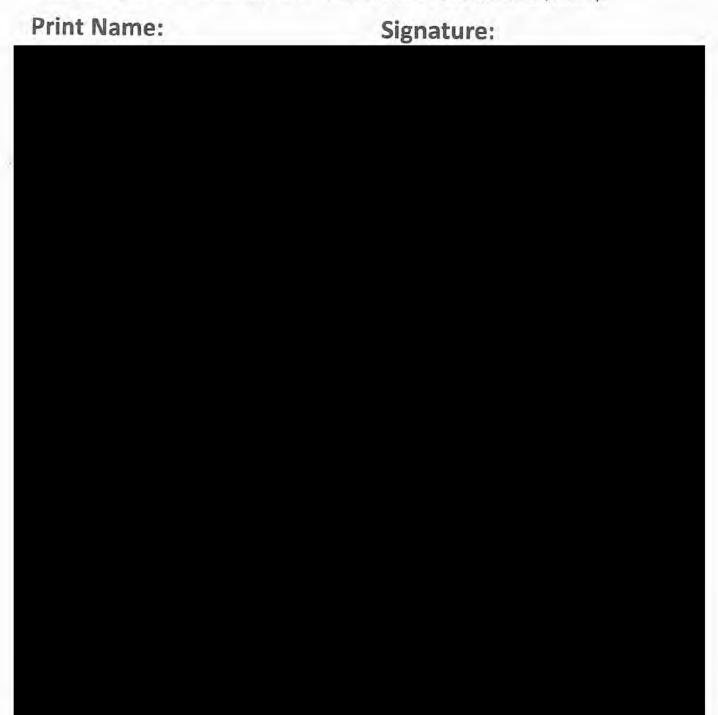


For the Avra Valley Coalition

Print Name:	Signature:	À
<del>-</del>		
-		
	R-	



Print Name:	Signature:



Comments as Requested on Proposed Corridor Options Meeting in Wickenburg, AZ, Thursday, May 11, 2017

1 T (upper, green) Favorable

Will eliminate congestion along twisty road between Congress and Wickenburg. Will cross US 60 away from congested area. Should definitely be considered favorably.

2 U Unfavorable

Cuts too far into park area.

3 V Unfavorable

Cuts park into two pieces. This definitely should not be done.

4 S Favorable

The west of the two proposals will be less intrusive into the park area. Park area should be intruded on as little as possible.

5 V Unfavorable

Travelers wanting US 60 instead of I-11 have other opportunities to enter/exit. Going through national monument area is undesirable. Not having to bridge the river will be cost-saving.

6 W Unfavorable

Given that I-11 will require a right of way width of approximately 400 feet, or more if other utilities corridors are added, W would put this right of way through hilly area, would greatly increase congestion in a congested area, and would ultimately put this wide right of way through developed commercial area. It is neither necessary nor desirable to destroy an area in order to save it.

I-11 Comments 05 16 2017

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

RE: I-11 Alternatives Evaluation
Alternative Routes C and D through the Avra Valley

#### Greetings:

Thank you for the opportunity to comment on the alternative routes currently under consideration for I-11.

I wish to register vigorous opposition to the alternative routes C and D which go through Avra Valley.

This is an utterly unsuitable route for this interstate to take.

Here are some of the reasons why this route should be permanently deleted from consideration for this project.

- Building I-11 in Avra Valley would bring about complete destruction of the homes and way
  of life for thousands of Avra Valley residents, ruining the peaceful beauty of this valley and
  turning it into a polluted, noisy and hazardous place.
- 2) Inadequate public right-of-way between the Bureau of Reclamation Tucson Mitigation Corridor and the Tohono O'Odham Nation
- 3) Negative impact on the inter-mountain wildlife corridor, and destruction of wildlife.
- 4) Negative impact to Saguaro National Park West
- 5) Negative impact on Tucson Mountain Park
- 6) Negative impact to the Pima County Conservation Lands System
- 7) The cost is TWO THIRDS higher to build this corridor in Avra Valley than it would be to take the route down the existing I-10 corridor.
- 8) Taking the route through Avra Valley would destroy existing jobs and businesses along the I-10 corridor, as truckers will be forced away from existing services along the I-10 corridor through Tucson. These people and businesses cannot simply relocate to Avra Valley!
- The route through Avra Valley VIOLATES PIMA COUNTY POLICY as stated in the Supervisor's Resolution 2007-343.
- 10) Taking the route down the I-10 corridor would not require the destruction of homes, jobs, businesses, lives and wildlife.

IT MAKES NO SENSE even to consider building a separate highway, when we already have an interstate in place, improvements on which we have been paying for for years!

Those very improvements have been specifically to widen the infrastructure of this existing highway in order to accommodate Plan Option B, building a double deck on six miles of that existing interstate.

#### In addition:

While I realize that the concerns of an individual's life are probably of no interest to this planning committee, I would like to mention my personal feelings about this.

I am a 63 year old single woman who worked hard to save up the down payment for the acre of land and home that I own just off Sandario Rd. south of Picture Rocks. For the past 9 years I have put my heart and soul into this home. I have landscaped the property, creating efficient watershed management berms and basins, and encouraging the prolific growth of native flora, and I have done this work by myself with nothing but a shovel and digging stick. I have faithfully watered baby trees, nurtured new growth, painted the house inside and out, and added other improvements, in thousands of hours of hard work that I have done entirely on my own. I have created a sanctuary for myself and the other creatures who live here.

I moved to this location because it is beautiful, peaceful, and quiet, and wildlife abounds here. Javelina, jackrabbits, coyotes, Great Horned Owls, cranes, ravens, Red Tailed Hawks, lizards, snakes, and tarantulas are all my constant neighbors. This is my life, and if a freeway is placed next to my home, this life will be destroyed. Due to age, health issues, and the need for me to retire soon, I would not be able to start over and do all this again somewhere else.

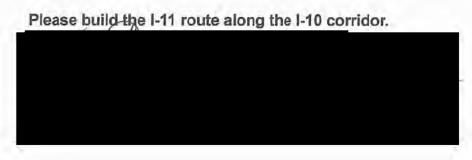
I know this is only one person's story. But I am by no means alone in these feelings. Thousands of people have made their lives in Avra Valley, Picture Rocks, and the surrounding areas. We came here because it is quiet and peaceful and beautiful and we love it here. Most of us have worked very hard to improve our homes, putting thousands of dollars and hours of work into them.

This completely unnecessary and inappropriate plan to build I-11 in Avra Valley would destroy the homes and lives of thousands of people just like me. Good, hardworking honest people who take pride in their homes. This plan would destroy our way of life, and we will band together to fight it every step of the way.

Please take Avra Valley off the list of possibilities for the route for this project.

There is no need to create such wholesale destruction!

A route already exists, on the I-10 corridor, which would NOT DESTROY ANY LIVES, human or wildlife!



Study Team,

I am a 23 year resident of Avra Valley and a Realtor in Tucson. My adobe home on 4 acres is in the I-11 study area.

I am against the Avra Valley route for many reasons.

We moved to this unique area for the nature and quiet desert that must be protected. Much of the I-11study area was set aside as protected lands and I-11 goes against these protections.

Avra Vally is the source of the City of Tucson's WATER. The CAP canal and Tucson's water needs to be protected from the pollution and hazards that vehicles would bring.

Tucson has many visitors who come ONLY to enjoy the amazing Desert and Parks. Avra Valley is home to many of Tucson's top tourist destinations including Saguaro National Park, Arizona-Sonora Desert Museum, Tucson Mountain Park, Kitt Peak National Observatory, and Ironwood National Monument. I-11 would destroy these unique places for desert animals, visitors and residence.

The City of Tucson Web site: "Tourism accounts for one of every 10 jobs and adds over \$1.8 billion per year to the local economy. Travel and tourism produce 40,000 jobs in all of the sectors listed in the Employment section above, and has been one of the most rapidly growing industries in Tucson."

Are we willing to destroy a huge part of the \$1.8 billion per year to the local economy?

Future needs will change. I am a Realtor and work with new and established resident's in all of Tucson. Locals won't even drive across town, they want to stay in their own areas. I don't see locals using I-11 in Avra Valley since it is far West of Tucson.

Autonomous vehicles are in the near future and will change our transportation needs.

I am for improving I-10 and I-19 as the best option.

I-10 should have more lanes added from Phoenix to Tucson. This route already exists. Currently I-10 goes from 4 to 3 to 2 lanes in some stretches.

2 lanes is ridiculous! Double deck I-10 through Tucson.

Please take the Avra Valley option off the table.

Sincerely,



## Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212 Tucson, Arizona 85705 520.388.9925 # sonorandesert.org

June 2, 2017

Arizona Center for Law in the Public Interest

Arizona Native Plant Society

Bat Conservation International

Cascabel Conservation Association

Center for Biological Diversity

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Environmental Law Society

Friends of Cabeza Prieta
Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro
National Park

Friends of Tortolita

Gates Pass Area Neighborhood Association

**Genius Loci Foundation** 

Native Seeds / SEARCH

Protect Land and Neighborhoods

Safford Peak Watershed Education Team

Save the Scenic Santa Ritas

Sierra Club — Grand Canyon Chapter

Sierra Club — Rincon Group

Sky Island Alliance

Society for Ecological Restoration

Southwestern Biological Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

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

RE: Comments on Corridor Alternatives for the Proposed Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

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

We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 30 environmental and community groups working in Pima County, Arizona. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. We achieve this mission by advocating for: 1) protecting and conserving Pima County's most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species.

In summary, our comments on the corridor alternatives highlight: 1) the need for further evaluation of the purpose and need for this project, 2) major environmental impacts that should be considered statewide and particularly in Pima County as the proposed corridor alternatives are evaluated, and 3) the need for a coordinated evaluation of all transportation alternatives, including multi-modal solutions and the inclusion of expanded rail service.

We are in opposition to Corridor Alternatives C and D in particular. Corridors C and D would both have grave and devastating environmental impacts to Pima County. This includes:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation's Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County's Conservation Lands System.

- Impacts to planned mitigation lands for Pima County's Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).
- Impacts to critical wildlife linkages and connectivity between large wildland blocks as
  described in the 2006 Arizona's Wildlife Linkages Assessment (completed by a diverse
  group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity
  Assessment (conducted by the Arizona Game and Fish Department (AzGFD)), including the
  Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.

#### **Purpose and Need**

First and foremost, we strongly believe that ADOT should clearly and thoroughly demonstrate the need for this corridor based on the best available science and data. This includes the most current transportation and growth models and current and projected traffic volumes. The analysis must include established plans to continue widening Interstate 10 and improving capacity from Mexico's Mariposa Port of Entry and the recent approval of ADOT's 2017-2021 Five Year Plan. Elements of this Five Year Plan that must be considered include, but are not limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.

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

Finally, ADOT's 2011 "State Rail Plan" was developed to address the needs of both freight and passengers and should be considered and included in the analysis for the proposed corridor alternatives for Interstate 11<sup>2</sup>.

<sup>&</sup>lt;sup>1</sup> See <a href="http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson">http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson</a>.

<sup>&</sup>lt;sup>2</sup> See: <a href="https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0">https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0</a>. This rail plan was based off of this study completed in 2010: <a href="https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0">https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0</a>.

#### Major Environmental Impacts for Evaluation for Corridors C and D

#### Impacts to Federal and Local Protected Areas

Corridors C and D would both have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the biological resources they contain. Corridors C and D would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County's federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and mitigation lands in Avra Valley are critical to its long-term success. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014 and this HCP is currently under review. In addition, Corridors B, C, and D would negatively impact smaller, yet still vitally important, local protected areas such as Tortolita Mountain Park, the Hardy Wash system and Arthur Pack Regional Park, and others. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are just as important to consider as federal conservation lands in Pima County. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are located in Avra Valley, and directly in the path of proposed Corridor Alternatives C and D. It has been disappointing to see a general lack of awareness and acknowledgement of these important local conservation lands in recent public presentations and materials and we encourage you to more visibly and vocally address potential impacts to these lands in the future.

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

#### Impacts to Wildlife Linkages

Corridors C and D would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally-recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AzGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AzGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife

Linkage Design, including large swaths of land in Avra Valley. Corridors E and F would also sever the Ironwood-Picacho wildlife linkage.

Corridor B would negatively impact a highly threatened wildlife linkage between the Tucson and Tortolita Mountains and the larger study area skirts the edge of another highly threatened wildlife linkage between the Tortolita and Santa Catalina Mountains. Both of these wildlife linkages have been the focus of substantial public investment in recent years by the state of Arizona, Pima County, and other local jurisdictions. In March 2016, the Sonoran Desert's first wildlife bridge, funded by Pima County's Regional Transportation Authority, was completed in the Santa Catalina-Tortolita Mountains wildlife linkage. Smaller wildlife underpasses are planned for Tangerine Road and Silverbell Road within the Tucson-Tortolita Mountains wildlife linkage.

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing any important movement area for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park. Scientists are becoming increasingly concerned about the isolation of this wildland block as development pressures increase from the east and north. Corridors C and D would only further cement the total isolation of wildlife that live in the Tucson Mountains and Saguaro National Park. This would result in devastating and irreversible consequences for wildlife diversity, genetic health, and overall ecosystem resilience in this area.

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

All proposed corridor alternatives for Interstate 11 would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AzGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically-based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS must be considered when analyzing all proposed corridor alternatives. All impacts to CLS acreage must be fully mitigated as close to the area of impact as possible, with habitat as good, or better, than that impacted.

#### Impacts to Riparian Habitat

All proposed corridor alternatives would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

"Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state."

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of the floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS's IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

#### Impacts to at-risk species

All proposed corridor alternatives would negatively impact a range of specific wildlife species and especially those classified as federally "endangered" or "threatened," those identified by the state of Arizona <a href="HabiMap">HabiMap</a> as "species of conservation concern or species of economic and recreational importance," and those identified by Pima County and FWS as "vulnerable" under the SDCP. Some of these species include, but are not limited to:

Aberts towhee Bell's vireo Western burrowing owl

<sup>&</sup>lt;sup>3</sup> http://www.azgfd.gov/pdfs/w c/partners flight/APIF%20Conservation%20Plan.1999.Final.pdf

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

#### Impacts from noise and light pollution

All corridor alternatives would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they utilize through noise and light pollution. Corridors C and D would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights and from reasonably foreseeable future commercial and residential development.

#### **Broader Impacts**

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

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

Additionally, a cost-benefit analysis of alternative(s) that involve double-decking I-19 and/or I-10 should be completed. This approach could reduce the cost of ROW acquisition and potentially avoid any new impacts in the Avra Valley. However, there would be increased environmental impacts from further fragmentation of the Tucson-Tortolita Mountains wildlife linkage corridor, which could be mitigated by construction of a wildlife crossing structure over I-10, as was recently successfully done on SR 77. The feasibility of such a structure has previously been discussed and

accepted in principle by Pima County's RTA Wildlife Linkages Working Group, ADOT, AZ State Land Department, AzGFD, Pima County, Town of Marana, Coalition representatives, and others.

We also encourage a thorough evaluation of rail alternatives to accommodate future traffic increases and concerted coordination with other planning efforts such as Arizona's "State Rail Plan" completed in 2011.

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

#### 2007 Pima County Resolution

In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Additionally, the Board called for the expansion of "capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor." We strongly concur with Pima County's elected officials and their 2007 resolution (attached). Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

Thank you for the opportunity to provide comments on the proposed corridor alternatives for the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg. Given the farreaching and devastating impacts that proposed Corridors C and D would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, our strongest recommendation is the elimination of Corridor Alternatives C and D from further evaluation. We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.



Attachment: Pima County Resolution No. 2007-343

## **RESOLUTION NO. 2007-** <u>343</u>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; and

WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation — while reducing air pollution and greenhouse gas emissions — by instead expanding capacity and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

- 2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
- Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18thday of December \_\_\_, 2007.

Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:

Clerk of the Board

Deputy County Attorney

30 May 2017

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

To the Interstate 11 Tier 1 EIS Study Team:

Corridor Option Letter: A and B. Favorable.

#### Reasons:

- I 10 through Tucson already exists. I 10 is easily expandable.
- I 10 already has businesses all on the existing frontage roads.
- I 10 already has a big easement.
- The change in noise would be minimal.
- The cost is far less than other options to get a useable corridor particularly in a world where no funding is currently available.
- Regional mobility is increased while serving international mobility—the direct connection of Las Vegas to Phoenix to Tucson is needed.
- These are economic activity centers and access to Tucson's existing transportation assets is far better on I 10 than via the currently bucolic "west" of the Tucson Mountains.
- While extensive population growth and congestion is projected for Tucson, that's a big if—
- What's the water plan? What's the increase in heat?
- The existing I 10 does not ruin a national park, ruin one of the top 10 museums in the world, does not ruin a state park, does not ruin the existing quiet world near to Tucson.
- The existing I 10 enhances the existing economic structure which has plenty of room to grow where it is.
- The existing I 10 allows water resources, biological resources and air quality to remain undisturbed.

Corridor Option Letter: C and D. Very Strongly Opposed.

#### Reasons:

- C and D are substantially more expensive than other options.
- C and D create new roads in flood plane areas.
- C and D create new roads that will require additional maintenance costs.
- C and D severely disrupt parks, people, and recreation activities.
- · C and D severely disrupt water resources, wild life, and air quality.
- C and D were opposed by the Pima County Board of Supervisors.

- C and D deter Tucson regional mobility.
- C and D deter Tucson economic growth.
  - C and D limit access to Tucson economic activity centers.





#### 1 June 2017

#### Dear ADOT

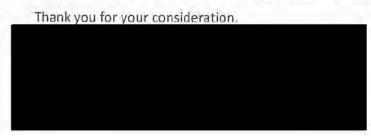
Architects, planners, civil engineers, etc. are the individuals we trust to design these infrastructures in order to serve our transportation needs efficiently and effectively and I am sure they have considered the feasibility of each of the alternative I-11 corridors with thoughtfulness and sound science. Thankfully, people and politicians have embraced the process of additional public input into these projects and I would like to respectfully add mine.

I have a personal and professional interest in the area especially between Casa Grande and Marana, the segments labeled E, F, and G, the so called "Santa Cruz Flats." My colleagues and I have spent many years in this proposed section and have been fortunate to get to know the flora, fauna, and other natural resources very well (Brown, et al. 2017). There are a number of unique habitat types that would be irreparably altered with a new freeway including wetlands, riparian corridors, sand dunes, playas, mesquite bosques, Sonoran Desertscrub, and even agriculture. Species of importance such as the Crested caracara (Caracara cheriway) and Emory's crucifixion thorn (Castela emoryi) would also be profoundly impacted and likely exterpated.

There are also a number of cultural sites along the Santa Cruz Flats that would be destroyed with sections E and F including a large pottery mound (32.573830° -111.607610°) and ground figures (32.556527° -111.757699°).

My recommendation is to favor the existing A, B, and G corridors over any alternatives. The terrain can easily accommodate lateral expansion along existing rights of ways and there is really no need for parallel freeways here. I have heard the arguments concerning emergencies and homeland security but what is the precedence and where do we stop? Are we to build freeways next to freeways everywhere? Why is there not an I-17b or an Alt I-10 west of Phoenix? Freeways that frequently shut down due to accidents. I think you see where I'm going here and that simply increasing lanes along much of the I-10 is a reasonable solution especially in the area of the Santa Cruz Flats.

Progress is a consequence of the human condition. Humans are the earth's quintessential species when it comes to technologically altering our world, and it is natural to assume that growth will always be in our future... but this is an opportunity to preserve what we can in the process.



Brown, D. E., E. Makings, et al. 2017. Biotic Resources of the Santa Cruz Flats, Pinal County, Arizona. Desert Plants: Vol. 32 No. 2.

June 2, 2017

Mr. Jay Van Echo

Sent Via: U.S. Mail and Electronic Mail

I-11ADOTStudy@hdrinc.com

JVanecho@azdot.com

Project Manager Interstate 11 Tier I EIS Study Team Arizona Department of Transportation Communications Phoenix, AZ 85007

Re: Estrella Mountain Ranch Developers, LLC (Estrella) - Comments on the Alternative Routes Being Considered for Interstate 11

Dear Mr. Van Echo,

Thank you for the opportunity presented to the stakeholders and community members to provide input on the various corridor route alternatives being considered by ADOT for the future Interstate 11 corridor through Central Arizona. I had the pleasure of attending the Agency Coordination Meeting in Avondale on Tuesday, May 16, 2017 where I was able to look at the various project graphics. Please accept my complements on the excellent and informative Agency Coordination Meeting, your slide presentation, and the very informative and user-friendly display graphics.

Through this letter, on behalf of Newland Real Estate Group, LLC, as Development Manager for Estrella Mountain Ranch Developers, LLC, I would like to put on record our strong preference for the I-11 alignment alternatives 'M' and 'N' as shown on the Central Section Maps during the recent Agency Coordination and Public Information Meetings.

As you know, Estrella Mountain Ranch Developers, LLC (through its subsidiaries) owns approximately 20,000 acres of combined land (called "Estrella") just west of the Estrella Mountains in the west valley of the Phoenix Metropolitan Area. Estrella was originally named Estrella Mountain Ranch when it was initially planned and development was initiated in 1985, but the name has subsequently been shortened to Estrella for ease in marketing purposes. Estrella is a master planned community located within City of Goodyear, AZ and is uniquely situated in a broad valley between several prominent natural features, including the Gila River, the Sierra Estrella Mountains, and the Sonoran Desert National Monument.

Estrella accounts for roughly 32 square miles of the City of Goodyear (roughly 20% of land area within the City of Goodyear), and is located just south of I-10, and in close proximity to the I-10/SR 303L Systems Interchange. At build-out, Estrella is expected to provide a total of approximately 51,000 residential units (approximately 144,000 residents [using an average household size of 2.82; Source: Estrella Strategic Plan – December 31, 2006]) and is anticipated to create 51,644 jobs. At present, Estrella is home to approximately 14,000 residents. Estrella is anticipated to help in realizing the City's vision for a resilient and diversified economy by providing an opportunity for

locally based employment and economic opportunity, and serve as a home to an educated and healthy workforce. Estrella master planned community provides a well-connected roadway network, and aims to provide an efficient multimodal transit system and options for other modes of travel. As you can imagine, the development potential of the Estrella community is directly linked to the future SR 303L South Extension and Interstate 11 Trade Corridor going through this area.

The master plan for Estrella was developed in the early 2,000's with the assumption that the future SR 303L South would cross the Gila River and remain west of the Estrella community and then traverse to the east through Estrella between the Germann Road and Queen Creek Road alignments. The key theme of the strategic development plan for the community identified four activity centers within the community, with the future freeway corridor providing access to these centers of business and commerce. The freeway corridor would provide opportunities for local and regional economic development. The Estrella Strategic Development Plan is attached to this letter (Appendix A) for your reference. The master plan for Estrella was developed in coordination with the City of Goodyear, and the City bought into the concept of connected activity centers when it adopted the Estrella master plan into its General Plan document.

The City of Goodyear 2025 General Plan, in its future Land Use and Transportation Plan, identified the SR 303L/I-11 corridor as a major transportation artery through the city, and through the Estrella Mountain Ranch Development. The Land Use and Transportation Plan (see attached Appendix B) identified a generally north-south freeway alignment, which corresponds with the I-11 alternative alignment "N". Additionally, a generally east-west freeway alignment is also shown in the General Plan that corresponds to the I-11 alternative alignment "M". The City of Goodyear envisions the Estrella master planned community playing a critical role in the growth of the City by providing a compatible mix of land uses that foster a quality community; providing an integrated lifestyle with residential neighborhoods, commercial activity centers, and a variety of trails, open space, and recreational activities; and ensuring that a good mix of land uses and zoning will ensure a stable revenue stream in the future.

The I-8/I-10 Hidden Valley Transportation Framework Study conducted by the Maricopa Association of Governments (MAG) also identified the future SR 303L South freeway corridor (alignment "N") and the future Hassayampa Freeway (alignment "M") as part of the Recommended Framework (Appendix C). In addition, the Interstate 10/Hassayampa Valley Transportation Framework Study also called for the SR 303L South Extension (Appendix D).

The City of Goodyear and Estrella Mountain Ranch Developers, LLC have made significant investments in our community's future by planning for development around a future interstate highway/freeway corridor. As mentioned before, the four existing and proposed economic activity centers within the Estrella master planned community would be strongly supported and enhanced by the access and substantial mobility capacity provided by a future SR 303L South extension/I-11 trade corridor. These freeway

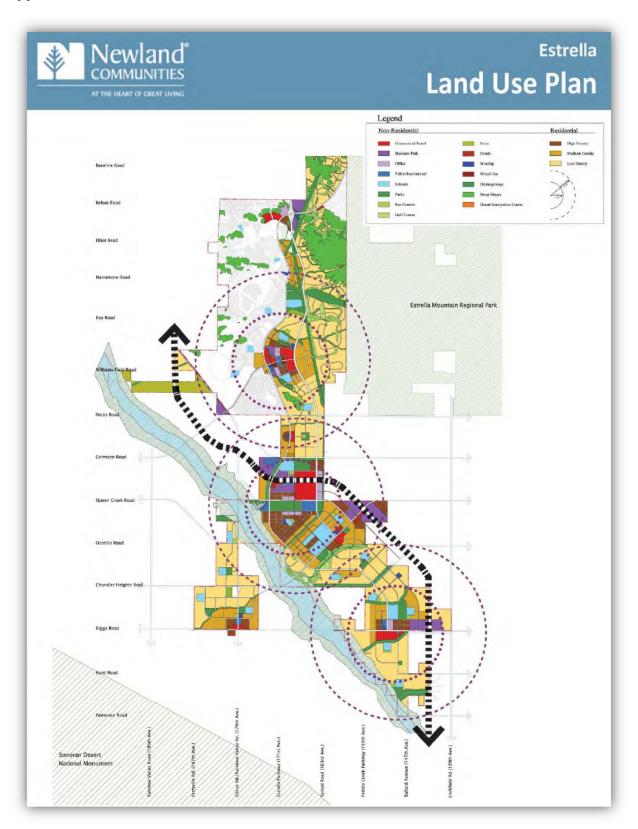
corridors are the backbone of regional economic development envisioned within Estrella and city of Goodyear.

Should ADOT's Alternative Selection Report process for the I-11 Corridor result in the selection of alignments "M" and/or "N" as a result of technical analysis and public input, Newland Communities would be willing to discuss opportunities for dedication of right-of-way for the corridor where it crosses the Estrella master planned community.

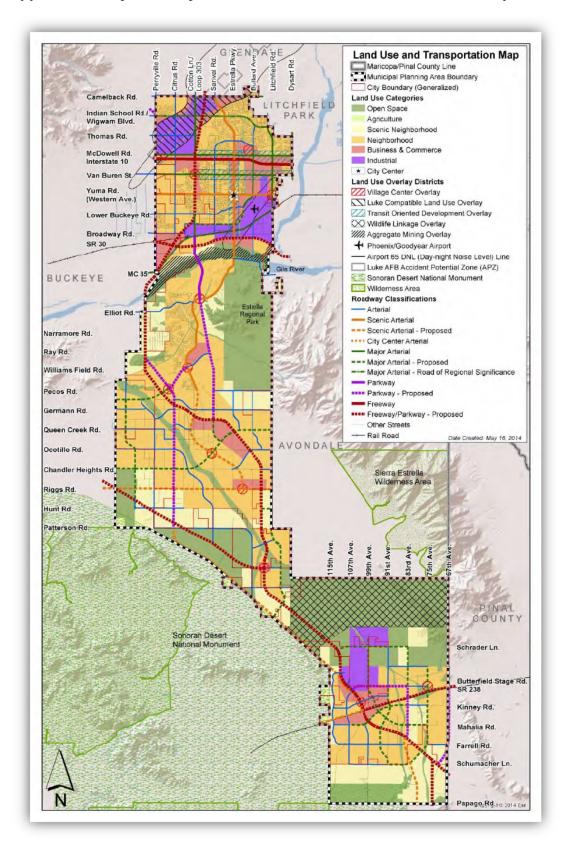
Please feel free to contact me at (602) 468-0800 if you have any questions or concerns regarding Newland Real Estate Group, LLC and Estrella Mountain Ranch Developers, LLCs position on this very important project.

Thank you.

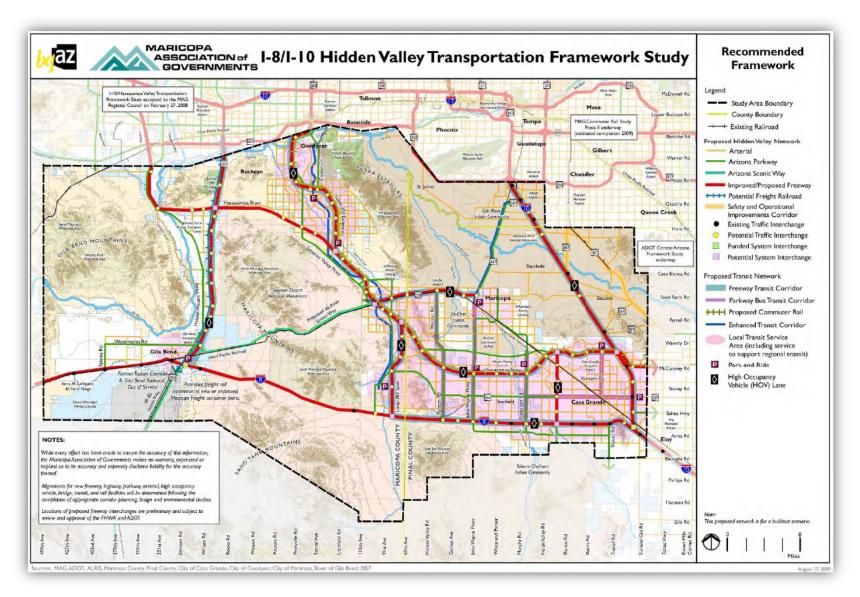
Appendix A: Estrella Land Use Plan



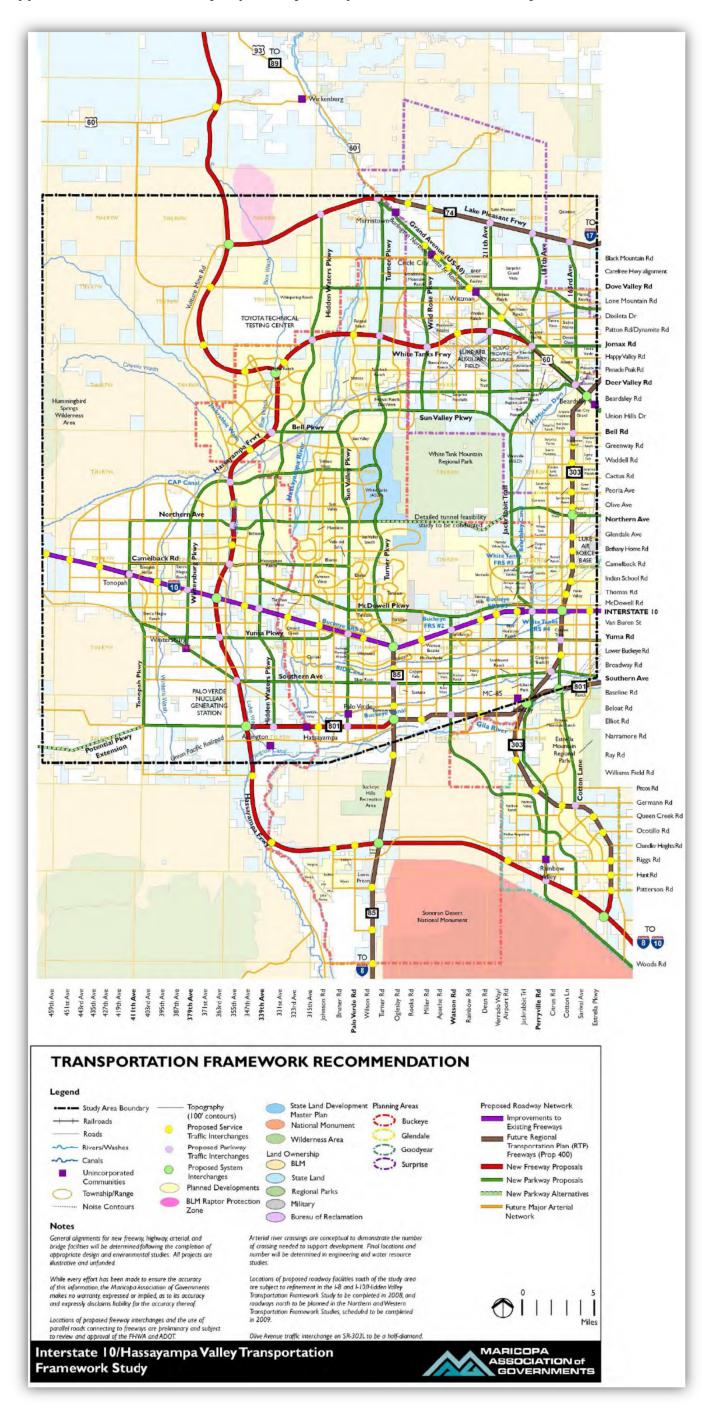
Appendix B: City of Goodyear 2025 General Plan - Land Use and Transportation Plan



Appendix C: MAG I-8/I-10 Hidden Valley Transportation Framework Study - 2009



Appendix D: MAG I-10/Hassayampa Valley Transportation Framework Study - 2008





May 26, 2017

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

To Whom It May Concern:

Interstate 11 - NO TO THE AVRA VALLEY ROUTES

The proposed I-II Avra Valley routes C and D would be a travesty and environmental disaster for Southern Arizona. The presence of significant recognized and respected natural areas including Saguaro National Park West, Ironwood Forest National Monument, Tucson Mountain Park, the Arizona-Sonora Desert Museum visitors and the Wildlife Mitigation Corridor say NO to an interstate highway through the Avra Valley. The wildlife routes between various mountain ranges say NO. The water co-op wells and recharge basins in the Avra Valley say NO. The astronomy research at Kitt Peak says NO. And the Avra Valley residents say NO to the destruction that would occur including air, water, light and sound pollution.

With the option of double-decking |-10 the answer to Routes C & D is NO for economic reasons both financial and time to build.

In the future we will be judged not on how much and how quickly merchandise could be moved, not on enriching the coffers of both private/corporate and public/governmental groups, but on how respectful we have been to the natural environment that sustains us all in ways not always easy to measure.

Thank you for considering these concerns and for your wisdom to say NO to the I-II Avra Valley routes.



This message has also been sent by email.

Dear ADOT: and teacher 1975 - 81 Please choose page

Thave Para traducir este sitio al español, use Google Translate localizado en la parte de abajo.

History been following this I -11 E15 process from the beginning to Ticially in 2016 and attending Study Overview meetings of 90% angrey Tucsonans who feel this project is necessary, which I short believe it is and many of them did not as well or it it be constructed it may not be routes C or D shrough Avra Valley.

Besides swerly damaging the Visual and and impact Engueers National Park Mest and Ironwood Forest National Monument In addition it would complete a wirtual, real freeway ring around our beautiful Tucson Mountain park, outing of wildlife mod usidide (terrestrial) movements. How on A Dot condemplate ouch a desectation of of beautiful Sonoran Desert which was supposed by agreed upon by all the powers that be so ably lead by Corolyn Coupbell, Tueson and Pina county Board of Trigrery isors and Signed on to by them to 255 we where development

Could and could not elevelope. These I - 11 voutes C + D fly directly in the face of that carefully-crafted 5 moran Desert Conservation Plan. You're obviously determined from what I heard it Spokeman said at the May 11 of meeting ("If you cannot provide realty good reasons not to put the route through the blue or green path, then that is where it will go " already predetermined t would say, To much for public process! It is shameful. In my 48 years here in Tucson, this is the worst example of public process I have witnessed. I vote on Silones: 1) No freeway - we have quite enough development have already - and for a tenuous plan that may not panout 2) No Con Dronte up Avra Vally 3) I-10 allotment if ofour must I truly hope all of this will flowlers thank you for the opportunity to comment Smeerely,



June 2, 2017

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

RE: Interstate 11 Corridor Environmental Study - Nogales to Wickenburg

Dear Interstate 11 Tier 1 EIS Study Team,

The Ford Motor Company ("Ford") appreciates the opportunity to provide feedback on the alternatives presented in the Interstate 11 Corridor Environmental Study.

Ford's 1,500 acre Arizona Proving Ground facility ("APG") is located strategically at 20715 West Happy Valley Road, Wittmann. Our operation is adjacent to the Luke Air Force Base Auxiliary Field #1 and is an integral and crucial part of the global product development process of our vehicles. Over 1,500 vehicles supporting most of our global vehicle programs are tested annually at APG. Since 2004, Ford has invested more than \$45 million in facility improvements at APG. Ford invites hundreds of visitors; many during the hot months when most people try to avoid the Phoenix Metropolitan area. The visitors and our APG facility operation contribute approximately \$14 million annually to the local economy.

We have reviewed the map presented at your public meeting on May 16 at the Buckeye Community Center and presently available on your website specifically Corridor Alignment W. Ford is not supportive of Corridor Alternative W as it is too far to the east, especially the northern most part of the alignment before it connects with U.S. Route 60. Any Interstate 11 alignment that would jeopardize the existence and viability of APG could be devastating to our operation. With the construction of the highway, other development will no doubt occur and it is possible that the future development would be incompatible with our operations.

In our discussions with the City of Surprise ("City") and its Transportation Planning Manager, Martin Lucero, we have learned that the City would prefer an alignment that follows the Turner Parkway alignment. Ford also supports a Turner Parkway alignment.

Thank you again for allowing us to comment, and we truly appreciate your understanding and consideration.

Sincerely,



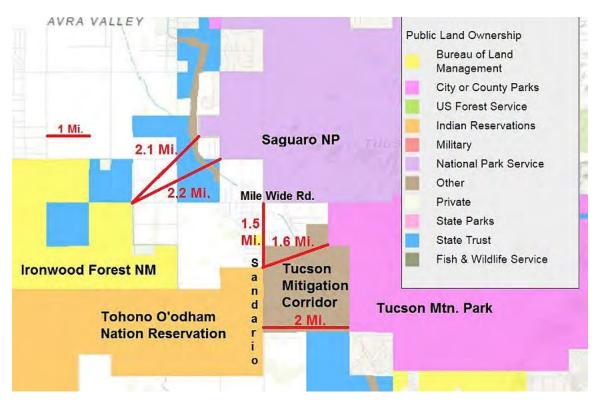
# Comments on Corridor Alternatives for the Proposed Interstate 11 - Friends of Ironwood Forest, May 2017

The Friends of Ironwood Forest submit the following comments for your consideration with respect to alternative Corridors for Interstate 11, Nogales to Wickenburg, Arizona.

We believe that a corridor alignment west of the Tucson Mountains, through Avra Valley, either Corridor C or D as described in the Public Information Meeting, May 2017, has significant negative impacts that make it less preferable than alternatives for widening or double-decking I-10 east of the Tucson Mountains. We recommend that the following factors be considered in evaluating alternative corridors, and that they be discussed in the Environmental Impact Statement (EIS).

#### **Proximity to Public Lands:**

A corridor alignment in Avra Valley would place the highway in close proximity to a number of lands that are of special importance to the public. West of Avra Valley are Ironwood Forest National Monument and the Tohono O'odham Nation. East of Avra Valley are the Tucson Mountain District of Saguaro National Park, the Tucson Mountain County Park, and the Arizona Sonora Desert Museum. An Avra Valley alignment would pass between the east and west portions of these lands. The following figure illustrates the highly restricted situation in the vicinity of Mile Wide Road:



A major concern is that the "Level of Detail" presented to the Public in the May 2017 Information Meeting establishes a corridor width of only 2000 feet, or 1000 feet on either side of the corridor centerline. There is no justification given for the selection of this width. This width might be appropriate for defining the location of alternative corridors, but the wording of the presentation implies that environmental impacts will be evaluated only inside this corridor width for each of the alternative corridors. This limit is totally inadequate for evaluating the impacts of I-11 on nearby public lands. Environmental impacts such as noise and disturbance of scenic quality will certainly be felt over much greater distances in natural areas such as parks and monuments. So the Environmental Impact Statement must evaluate impacts over much greater distances, at least a few miles, wherever a proposed alternative corridor is within a few miles of public lands.

Space is especially restricted in the vicinity of Mile Wide Road where the Tohono O'ohdam Nation is only 1.5 miles from Saguaro National Park and only 1.6 Miles from Tucson Mountain Park, while Ironwood Forest National Monument is only 2.1 miles from Saguaro National Park. These restrictions leave very little room for location of a multilane highway. Further restriction is associated with the Tucson Mitigation Corridor (TMC), discussed below relative to wildlife movement.

Bisecting our public lands with a heavily used transportation corridor would have a negative impact on the experience sought by visitors, including scenery, lack of noise, wildlife, and natural character. These are qualities that make Tucson an attractive tourist destination, and provide Tucson residents with a valuable urban wilderness experience. Some of the lands in Avra Valley that are not public are occupied by residents who place a high value on the natural, rural character of their surroundings. These factors all have an economic impact on tourism and real estate, which must also be discussed and evaluated in the EIS.

Of course, it's very difficult to place a quantitative value on the basic human need for natural, wild places. At a time when there is a growing scarcity of such places, the impacts on nearby public lands have become more important, and must be given a heavy emphasis in the selection of a corridor alternative. Because of restricted space between public lands in Avra Valley, these impacts are the ones most difficult to mitigate, short of constructing the highway somewhere else, such as east of the Tucson Mountains.

#### Impacts on Wildlife Movement:

With a relatively sparse human population, Avra Valley presently has relatively little impediment to east-west wildlife travel. As an example, bighorn sheep from Ironwood Forest have recently been sighted at numerous places in the Tucson Mountains. An Avra Valley alignment of I-11 could have a serious impact on such wildlife movement, and could lead to inbreeding of wildlife in the Tucson Mountains, trapped between metropolitan Tucson on one side and the I-11 highway on the other side. To mitigate this impact, the design of any major highway through Avra Valley would have to allow for east-west wildlife movement over the approximately 10 to 12 mile extent of the Tucson Mountains. There are two regions to be considered with respect to wildlife movement, the Tucson Mitigation Corridor (TMC), and the area north of the TMC approximately up to Avra Valley Road. A current impediment to east-west wildlife movement is the Central Arizona Project (CAP) canal.

The purpose of the TMC is to allow east-west wildlife crossing of the CAP canal by means of wildlife crossings over a series of submerged portions of the canal. The bighorn sheep noted above likely crossed through the TMC. The TMC was established by the Bureau of Reclamation in 1990, and is managed by Pima County. The TMC consists of 2720 acres (4.25 square miles) south of Mile Wide Road, connecting the Tohono O'ohdam Nation with Tucson Mountain Park. Sandario Road forms the western boundary. Future development, except for wildlife habitat improvement, is prohibited within the TMC. Therefore, a new grade level multilane highway would be currently prohibited in the TMC. Suggestions have been made for elevating I-11 through the TMC, using a structural base within the existing 80 feet right of way of Sandario Road, and/or for obtaining an increased width for the right of way. An enlarged right of way would not only affect the design of the supporting structure for an elevated highway, but might also allow consideration of a grade level highway. This in turn would require additional dedicated wildlife crossings of the multilane highway. There could also be a monetary cost associated with acquisition of an enlarged right of way. In addition, any scheme must include a means for accommodating the traffic currently handled by Sandario Road, and this must be described in the EIS. In any event, preserving the goals of the TMC, with minimal impact on wildlife movement, is a major objective that must be satisfied in evaluating alternative I-11 corridors.

North of the TMC and south of Avra Valley Road in Avra Valley, satellite imagery shows about a half dozen small roads (paved and unpaved) crossing over the CAP canal, and a few crossings not associated with roads. Although bighorn sheep might not use these crossings, there is a possibility that these crossings are used by other species. The EIS must evaluate the amount of wildlife usage on these canal crossings in order to establish corresponding requirements for dedicated wildlife crossings over I-11 north of the TMC that would assure continuity of east-west wildlife movement.

#### **Summary**

An I-11 corridor through Avra Valley would have detrimental impacts on nearby public lands and on natural wildlife movement. The EIS must discuss all of these impacts in comparing an Avra Valley alignment with double-decking or widening of I-10 east of the Tucson Mountains.

Thank you for considering these comments, and please let us know if you require any clarification. Please keep the Friends of Ironwood Forest informed of updates on the I-11 planning process.

June 2, 2016

Comments Concerning Corridor Alternatives for the Proposed Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg.

With this submission the Friends of the Sonoran Desert (FSD), a charitable organization registered in the State of Arizona, is providing our comments on the above. We appreciate the opportunity to provide these comments.

FSD is strongly opposed to siting of this new proposed Interstate highway through the Avra Valley. We share the concerns and opposition to the proposed siting advanced by the Coalition for Sonoran Desert Protection, the Pima County Board of Supervisors (including through their resolution No. 2007-343), and others in the region. Siting in Avra Valley will come at the cost of irreversible damage to the valley and its unique financial, recreational and natural resource contributions to the broader Tucson community and Pima County.

The transportation corridor conceived in this project is clearly and readily better suited through integration with the existing I-10 corridor. Fundamentally the highway and associated support structures and facilities will not be a major impact on the existing purpose of the existing I-10 corridor and the economic base for its purposes.

Avra Valley is the site of world famous Federal and County protected areas and stewardship programs with important wildlife populations that transit between the protected and other habitats in the valley. The integrity of this carefully developed regime is vitally important to the nationally recognized Sonora Desert Conservation Plan and the precedent setting Federal Incidental Take Permit secured through years of effort and work by Pima County and U.S. Fish and Wildlife Service officials and many others. There is no mitigation conceivable for the damage to the natural resources and their stewardship that would be suffered by the construction of a new and major highway through this valued

environment which has been the subject of significant investment by the Federal and local governments, and taxpayers.

We are particularly concerned about the isolation and erosion of the value of the Saguaro National Park. Tucson is world famous for this Federal park that clearly is a major economic and recreational asset to our region. Coupled with the Tucson Mountain Park and the Ironwood Forest National Monument, and other Federal protected lands, this combination of strategically designed and located habitats are a priceless asset for Tucson and Southern Arizona. The absolute barrier of a siting of I-11 through the Avra Valley and the blight of its presence will be a permanent, unnecessary loss of the values that so many have worked so long to provide for future generations of Arizonans and visitors to our communities. The siting of I-11 through the Avra Valley would be a perfunctory squandering of past investments and future promise for community and region.

None of these costs would be incurred by integrating the I-11 corridor with the existing I-10 corridor. This should not be a difficult decision.

May 27, 2017

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

Re: Public Comment

Dear sirs:

The I-11 website limits comments to 500 characters, which precludes thoughtful and substantive input from the public.

My comment, which is below, contains more than 500 characters. Please ensure it is included in the public comments for the period April 28 through June 2.

Until my retirement, I worked as a Project Engineer on highway construction projects throughout the northwestern states. I appreciate the visionary goals of the proposed I-11.

It's sometimes easier (and more satisfying) to punch a new highway through virgin country than it is to reconstruct an existing highway. Rebuilding a highway while maintaining traffic can be costly.

This cost must be balanced against the lifecycle costs of maintenance and repair of two parallel (and duplicative) Interstate highways. It must also be balanced against the benefits of rebuilding a six-mile stretch of highway then placing it into service immediately, versus constructing (for example) the entire eighty-mile stretch of new highway between I-19 and I-8 before any of it can be placed into service.

Another consideration is the aesthetic impact of some of the proposed options. In general, the options avoid county, state, and national parks, as well as national monuments and wilderness areas. However, the options' traffic noise could affect the parks' tranquility. Any perceived threats to the parks will make the EIS process much more difficult.

With these factors in mind, I suggest the following options.

Option A: I-19 from Nogales to Amado

Option B: I-19 from Amado to Tucson; I-10 from Tucson to Marana/Red Rock

Option G: I-10 from Marana/Red Rock to Exit 199; I-8 from Exit 199 to Chuichu Road

Option F: I-8 from Chuichu Road to Montgomery Road

Option H: I-8 from Montgomery Road to Pinal/Maricopa county line

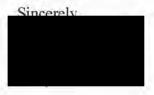
Option K: I-8 from Pinal/Maricopa county line to Gila Bend; Highway 85 from Gila Bend to Woods Road

Option Q1: Highway 85 from Woods Road to Komatke/Gas Pipeline Road

Option Q2: Highway 85 from Komatke/Gas Pipeline Road to Hazen Road

Option Q3: Highway 85 from Hazen Road to I-10 Exit 112; I-10 from Exit 112 to Exit 109

Option W: Sun Valley Parkway from Exit 112 to 291<sup>st</sup> Avenue; new construction from 291<sup>st</sup> Ave. to Morristown; Highway 60 from Morristown to Wickenburg; Highway 93 from Wickenburg to Highway 71





# Supplement for Comprehensive Plan And Area Plan Amendments (To be completed by the Applicant and filed with the application) (Additional sheets may be attached)

South of Sal	ome Highway between 331st Avenue and the Salome Highway / Southern
Pacific Rail	road Intersection
Land Use Plan	to be Amended: _Old U.S. Highway 80 Area Plan
Current Land	Use Designation: Rural Residential (0-1 d.u./acre)
existing Rur	of Property by Applicant: This application is submitted to amend the al Residential land use designation on the subject property to an and use designation in order to preserve and protect the following
	d uses: 1) chicken egg production and processing and 2) related feed
Summary of fe	er manufacturing eatures in the project request that do not conform with the Land Use
	rent Rural Residential land use classification on the subject property development of residential uses with densities less than 1 d.u./acre.
	n the Rural Residential category include agricultural and single family
	The Hickman's Egg Ranch operates its Arlington facilities under a statutor
agricultural e	To the Control of the
The Hic	kman's agri-industrial operations also require the use of heavy machinery,
outdoor storag	e, composting fields, and warehouse structures. Organic fertilizer is
manufactured c	n-site and eggs are homogenized and processed to create liquid and
hard-cooked ec	g products. The Hickman's distribute their products from the Arlington
site to 7 stat	es. These agri-industrial uses are not consistent with a Rural Residential
- V	Hickman's existing and proposed uses require an Industrial land use designished by the second of the blank of the second of the
	conform with the Industrial land use designation previously established by
	pah/Arlington Area Plan. The Hickman's developed their agri-industrial use
	rmer Industrial land use designation and request that the Industrial land
Time and Comments of the Comme	shed under the Old U.S. Highway 80 Area Plan. Furthermore, the area's
	proposed transportation system, natural washes, State land and nearby
	ndfill create a protected area well-suited for industrial development.
	nerstander in Konstanten en ste wiest anderen die entrete verschieden in der
Case Number:	
Case Mullipel.	



# ARLINGTON NORTH AND SOUTH COMPREHENSIVE PLAN AMENDMENT



# **Applicant**

Francis J. Slavin, P.C. 2198 East Camelback Road, Suite 285 Phoenix, Arizona 85016 (602)381-8700

### Owner -

Hickman's Egg Ranch, Inc. 6515 South Jackrabbit Trail Buckeye, Arizona 85326 (623)872-1120

CPA200911

RECEIVED JUN 1 9 2009

June 19, 2009



#### 1. INTRODUCTION

In 1944, Hickman's Egg Ranch was established in Glendale, Arizona when Gertie Hickman and her mother-in-law began selling eggs from their back porch at 67<sup>th</sup> Avenue and Missouri. Starting with 50 hens in 1944, the Hickman's have expanded their egg operations to include approximately 5 million chickens and 1 million chicks, or pullets. Today, the Hickman's are the only egg producer in Arizona and remain a family-owned and operated business. Their eggs are sold in Arizona, California, New Mexico, Nevada, Colorado, Texas and Hawaii. For a more detailed history of the Hickman's Egg Ranch business, please see pages 37 and 38 of the March 2009 issue of *Phoenix Magazine* attached hereto as **Exhibit "12"**.

Hickman's Egg Ranch currently owns 5 farms in 3 states. Two of the Hickman's largest farm facilities are located in an unincorporated area of Arlington, Arizona. A third farm is located on the Ak-Chin Indian reservation in Maricopa, Arizona. The Hickman's also have farms in Grand Junction, Colorado and a free-range flock in Valley Center, California.

The Arlington location is divided into 2 sites known as Arlington South and Arlington North. Arlington South was first established in 1998 and Arlington North was developed a decade later in 2008. The Arlington South location consists of 12 hen houses, 6 pullet houses, a main production/breaker plant production structure and an organic composting field. The Arlington North location contains 5 hen houses, a main production structure, a large field reserved for drying chicken manure, and a fertilizer pellet mill production area. Approximately 2.6 million chickens are housed at the Arlington Property. The Arlington chickens lay approximately 2.2 million eggs per day. Together, the Arlington South and North facilities employ approximately 200 employees.

The Hickman's business has evolved over the years from selling shelled eggs to include the following agri-industrial operations:

- Pullet houses which allow the Hickman's to raise their own pullets,
- · Chicken manure composting fields,
- A fertilizer pelletizing mill producing 50,000 tons of organic fertilizer per year. The high-quality, organic fertilizer is sold to farmers and golf courses,
- A breaking plant which produces liquid egg for sale to commercial users of eggs, and
- A hard cooked plant producing hard boiled eggs for restaurants.





The Hickman's Arlington location is more than an egg ranch. It is also the home of their processing, composting, packaging and shipping operations that have helped spur the growth of Arizona's sole egg producer. In many ways, Hickman's Egg Ranch remains a hometown agricultural business committed to providing quality products and service to its customers. At the same time, the Hickman's Arlington operations are industrial in nature fitting of an Industrial land use category under the Old U.S. Highway 80 Area Plan. Revising the existing Rural Residential land use designation to a more regionally appropriate Industrial category will promote and achieve many of the goals, objectives and policies of the Old U.S. Highway 80 Area Plan and Maricopa County Comprehensive Plan. Adjacent industrial uses, such as the Hassayampa Landfill and proposed Hassayampa Tire Waste Recycling Facility to the north, further support an Industrial designation for the Hickman's Arlington Property. The site also has access to several major roadways and highways within close proximity to the Arlington Property, such as: 1) the Interstate-10 and Salome Highway to the north; 2) the Southern Pacific Railroad, Old U.S. Highway 80 and Interstate-8 to the south; and 3) the SR-85 to the east. Furthermore, Hickman's Egg Ranch submits this Industrial Major Comprehensive Plan Amendment in order to preserve and protect its current investment, operations and employment base and to enable future expansion of the Hickman's agri-industrial business.

### 2. EXECUTIVE SUMMARY

#### 2.1 Location

The Hickman's Arlington site is located in Sections 3 and 10, Township 1 South, Range 5 West of the Gila & Salt River Base & Meridian. The property is situated in the western portion of Maricopa County approximately 40 miles west of downtown Phoenix. The proposed Comprehensive Plan Amendment area consists of 4 parcels totaling approximately 367 gross acres and 358 net acres (hereinafter the "Arlington Property"). The Arlington Property is located along the southern boundary of the Salome Highway, approximately 6 miles south of Interstate-10. The site is bounded by 331st Avenue to the west and the Salome Highway/Southern Pacific Railroad intersection to the east (See Exhibit "1" attached hereto).

Arlington South is located south of Ward Road and consists of 3 parcels – APNs 401-30-004E, 401-30-005B and 40-30-005C. Arlington North is located on 1 parcel north of Ward Road, APN 401-30-004D.

## 2.2 Current Zoning and Land Use Designations

The following table provides parcel and current land use information for the Arlington properties:

Page 5 of 33

Page H-344



PARCEL APN	ARLINGTON NORTH OR SOUTH	APPROXIMATE ACREAGE	Land Use Designation According to Tonopah/Arlington Area Plan (9/6/2000)	Land Use Designation According to Old U.S. Highway 80 Area Plan (May 2007)	Current Zoning District
401-30-004D	North	168.6 acres	Industrial	Rural Residential	Rural-43
401-30-004E	South	14.9 acres	Industrial	Rural Residential	Rural-43
401-30-005B	South	91.6 acres	Industrial	Rural Residential	Rural-43
401-30 <b>-</b> 005C	South	63.4 acres	Industrial	Rural Residential	Rural-43

The Hickman's constructed the first 3 hen houses at Arlington South in 1998. When the Maricopa County Planning Department drafted the original Tonopah/Arlington Area Plan in 1998 and 1999, the County asked property owners within the area plan boundary for their input regarding appropriate land use designations for their properties. The Hickman's requested an Industrial land use designation to be placed on their Arlington Property and the County agreed to their request. On September 6, 2000, Maricopa County adopted the Tonopah/Arlington Area Plan which covered approximately 403 square miles. The Tonopah/Arlington Area Plan formally designated the Hickman's Arlington Property as Industrial land use. A copy of the Tonopah/Arlington Land Use Map is attached hereto as Exhibit "4".

With an Industrial land use designation in place, Hickman's Egg Ranch spent millions of dollars constructing several new processing and manufacturing plants. An organic fertilizer pelletizing mill was added in 2005. The Hickman's began drying and composting chicken manure into high quality, organic fertilizer to be sold to farmers and golf courses. In 2006, a new breaking plant facility was completed on the Arlington South property. The breaking plant produces several liquid and frozen egg products. In 2008, a hard cooked facility was added, producing hard cooked eggs for commercial and retail customers.

Then, in May of 2007, Maricopa County adopted the Old U.S. Highway 80 Area Plan, which removed portions of the State Route 85 Area Plan and the Tonopah/Arlington Area Plan. The Hickman's Arlington Property was removed from the former Tonopah/Arlington Area Plan and was given a new Rural Residential land use designation





under the Old U.S. Highway 80 Area Plan. A copy of the Old U.S. Highway 80 Land Use Map is attached hereto as **Exhibit "5"**. The Hickman's were not notified that their Industrial land use designation would be replaced by a Rural Residential designation under the new area plan. The Old U.S. Highway 80 Area Plan states that "residents expressed their concern for preserving agricultural uses like the Hickman's Egg Ranch." Based upon this statement, the Arlington Property land use designation was changed at the request of residents in order to preserve agricultural uses. The Hickman's operation is more than an agricultural use. It is an agri-industrial business that warrants an Industrial land use designation. Only an Industrial designation will truly preserve and protect all elements of the Hickman's agri-industrial business.

Currently, the Arlington Property is zoned Rural-43 (RU-43) zoning district and is designated as Rural Residential (0-1 du/acre) under the Old U.S. Highway 80 Area Plan. **Exhibit "6"** attached hereto shows the existing zoning for the Hickman's property and its surroundings.

#### 2.3 Buckeye Land Use Map and Planning Area

The Buckeye Planning Area boundary is located to the east of the Hickman's Arlington site. The Buckeye Planning Area boundary runs north and south along 323<sup>rd</sup> Avenue. The Town of Buckeye designates the land east of 323<sup>rd</sup> Avenue and north of the Southern Pacific Railroad as Rural Residential (1.01 – 3 du/acre). The Town of Buckeye General Plan Land Use Map, ratified on May 20, 2008, is attached hereto as **Exhibit "7"**.

## 2.4 Existing Land Use

Together, the Arlington South and North properties contain 17 hen houses, 6 pullet houses, 2 main production plants, a breaker plant production area, a hard-cooked egg plant area, a dry storage area, fertilizer composting fields, a fertilizer pellet mill, several feeding silos, and evaporation ponds. Pictures of the Arlington Property are attached as **Exhibit** "9".

Approximately 2 million hens are housed within Arlington's 17 barns. Each barn contains double-sided aisles of chicken cages that rise to 6 levels high. Approximately 150,000 chickens nest in each barn. Automatic conveyor belts move feed from the feed silos to the chickens. Other conveyor belts remove the chicken waste from under the cages to transport trucks that haul the waste to an open field where it is spread into rows and is composted and dried. Separate conveyor belts transport the eggs to the production plants. The eggs move through automatic washers to an inspection station where they are tested for quality and sorted by an egg grading machine that deposits them into cartons. The cartoned eggs are packed into cases, loaded onto pallets and are moved to the cooler





from where they will be loaded onto trucks to be shipped to Hickman's customers and retail stores. Some eggs are transported to either the breaking facility or hard-cooked facility where they are processed into liquid or hard boiled product. The water used for the egg processing machines is stored in evaporation ponds located south of the Arlington South hen houses and re-used in the fertilizer composting fields.

The Hickman's operate 2 types of manure processing. For the first operation, the chicken manure is dried in windrows and turned by a compost-cat every other day. The dried manure is then packaged and sold. The second operation entails composting the chicken manure with an organic substance. The organic compost is then ground and pelletized to be packaged, sold and shipped to farmers and golf courses throughout Arizona and California. The Hickman's comply with all Hazard Analysis and Critical Control Point (HACCP) guidelines. Pictures of the Hickman's fertilizer manufacturing operations are attached hereto as **Exhibit "10"**.

The Hickman Arlington facilities are operated approximately 20 hours per day by 2 shifts of employees. The first shift starts at 6:00 am and works approximately 10 hours. The cleaning crew works the second shift until approximately 2:00 am. The Arlington facilities are manpowered by approximately 200 employees.

#### 2.5 Surrounding Land Uses

The Hickman's Arlington Property is surrounded by existing and proposed industrial uses, the former Hassayampa Landfill, State Land, and privately-owned parcels with scattered residential development. An aerial photograph of the Hickman Arlington Property and its surroundings is attached hereto as **Exhibit "2"**.

The Hickman's Arlington Property abuts the Salome Highway on the south. The former Hassayampa Landfill is located on the north side of the Salome Highway, directly across from the Hickman's property. The former Hassayampa Landfill was located on approximately 77 acres owned by Maricopa County. The landfill was operational for 36 years between 1961 and 1997. Of the total 77 acres, 47 acres were utilized for municipal and domestic waste disposal. A 10-acre portion of the 77 acres was used as a Hazardous Waste Disposal Area. The closed landfill was designated as a Superfund cleanup site in 1987 after hazardous wastes were disposed at the landfill during an 18-month period from April 1979 to October 1980. The Environmental Protection Agency and the Arizona Department of Environmental Quality have performed preliminary investigations at the landfill and are taking measures to clean up the site. The southwest portion of the landfill site is currently used as a solid waste transfer facility. According to Maricopa County



Planning Staff, residential development at the former landfill site is unlikely to occur due to deed and access restrictions recorded against the property.<sup>1</sup>

In June of 2008, Maricopa County sold to CRM of America Holdings, LLC (hereinafter "CRM") approximately 63 acres located north of the Salome Highway and adjacent to the Hassayampa Landfill to the west. The 63-acre site is located directly north of the Hickman Arlington Property being separated by Salome Highway. In November of 2008 and January of 2009, CRM submitted a Special Use Permit application and a Major Comprehensive Plan Amendment ("CPA") application, respectively, in order to allow the development of the Hassayampa Waste Tire Recycling Facility. The Maricopa County Planning Department assigned CRM's Major CPA Case No. CPA2008-13 and Special Use Permit Case No. Z2008119.

Within its CPA narrative, CRM states that the Maricopa County Waste Tire Recycling Program will be managed and operated under a 20-year contract with CRM to collect, recycle, and dispose of County residential and private waste tires. The proposed waste tire recycling facility will collect and process tires to produce a crumb rubber used in rubberized asphalt, synthetic turf applications and rubber molded products. CRM's CPA application requests that its 63-acre site be changed from Rural Residential to an Industrial land use category under the Old U.S. Highway 80 Area Plan. CRM also emphasizes that its tire recycling operation requires the use of heavy machinery, outdoor storage, and warehouse structures that are not permissible under the current Rural Residential land use designation. As shown by the pictures attached hereto as **Exhibits "9"** and **"10"**, the Hickman's Egg Ranch operations require heavy machinery, outdoor storage, and warehouse structures of an agricultural nature, but industrial in nature under CRM's description nonetheless. The proposed Hassayampa Waste Tire Recycling Facility and the Hickman's Egg Ranch are compatible uses fitting of an Industrial land use category.

In addition to the Hassayampa Landfill and proposed waste tire recycling facility to the north, a parcel with Industrial-3 zoning lies immediately southeast of the Hickman's Arlington property. The approximately 16-acre parcel is owned by Drew Equipment Rental, LLC. The site contains a warehouse structure and outdoor storage.

A small Rural-43 subdivision is located west of the Hickman's Arlington Property and 331<sup>st</sup> Avenue. The Phoenix Valley West Unit 2 subdivision plat was recorded on July 6, 1971 at Book 139 of Maps, Page 29, Official Records of the Maricopa County Recorder's Office. As shown by Exhibit "2", many of the lots within Phoenix Valley West Unit 2 remain vacant. When the Hickman's began construction of their egg production

<sup>&</sup>lt;sup>1</sup> The Hassayampa Landfill information was obtained from the Maricopa County Planning Department's Staff Report to the Planning and Zoning Commission, dated April 2, 2009, for Case No. CPA200813.





and processing facilities in 1998, one home was being constructed within the Phoenix Valley West Unit 2 subdivision. The rest of the subdivision was vacant land. After the Hickman's erected several hen houses and the egg processing plant, a handful of scattered homesteads were established throughout the subdivision. The Hickman's have maintained a good working relationship with its surrounding residential property owners and will continue to mitigate the effects of its agri-industrial operation on surrounding properties. By the end of this year, the Hickman's plan to install landscaping along their western Arlington property boundary.

State land is located north, south and further west of the Phoenix Valley West Unit 2 subdivision. State land abuts the Hickman's Arlington Property along the south 2,000 feet of its western boundary.

The south Arlington Property boundary is traversed by the Southern Pacific railroad. To the south of the railroad, private residences are scattered within small, irregular shaped parcels. State land surrounds the residential parcels to the south.

### 2.6 Proposed Land Use

At this time, Hickman's Egg Ranch plans to continue operating their Arlington farms as described above under an existing statutory agricultural exemption. In the future, the Hickman's will construct additional hen houses on the Arlington North site. Plans to develop a feed mill within the Arlington South property are underway. Additional protein processing operations may be developed on the northern portion of the Arlington property. Future business opportunities that will augment the Hickman's egg operations will be explored. Further development of the Hickman's Arlington Property will require additional employees and will provide employment opportunities for the area.

# 2.7 Existing and Proposed Transportation Systems

The Hickman's Arlington Property has access to a well-established transportation system in the West Valley. The existing and proposed freeway systems surrounding the Hickman's Arlington site support the Hickman's ability to ship egg products and fertilizer to all areas of Arizona and several states. Shipments to and from the Arlington Property travel along the Salome Highway, located along the north Arlington Property boundary. The Salome Highway is considered a future principal arterial street within the Old U.S. Highway 80 Area Plan and is designed to handle ultimate future traffic demand. From the Salome Highway, the Hickman's shipment trucks may access the Interstate-10 or the Old U.S. Highway 80. The Old U.S. Highway 80, between the Salome Highway and Oglesby Road, is also considered a future principal arterial road. Hickman shipments may travel east on the Old U.S. Highway 80 to connect to the SR-85 and from the SR-85 to the





Interstate-8. Examples of the Hickman's shipment routes are provided below to exemplify the substantial surface access to and from the Arlington site:

- Shipments to Phoenix exit the Arlington Property and head west on the Salome Highway. The shipment trucks then travel north on 331<sup>st</sup> Avenue to Baseline Road. Heading eastbound on Baseline Road, shipments turn north on Palo Verde Road until they connect to the I-10 East to Phoenix.
- Shipments to Tucson exit the Arlington Property and head east on the Salome Highway. The shipment trucks connect to the SR-85 and head south to the Interstate-8 East. From the Interstate-8, the trucks then connect to the I-10 East to Tucson.
- Shipments to Flagstaff exit the Arlington Property and head west on the Salome Highway to 331<sup>st</sup> Avenue. At 331<sup>st</sup> Avenue, the shipment trucks head north to Baseline Road. The shipments then travel east on Baseline Road and turn north onto Palo Verde Road. From Palo Verde Road, the shipment trucks turn east onto I-10, then north on the Loop 101 and north onto the I-17 to Flagstaff.
- Shipments to California exit the Arlington Property and travel west on the Salome Highway to 339<sup>th</sup> Avenue. The shipment trucks travel north along 339<sup>th</sup> Avenue to connect to the I-10 West.
- Shipments to Nevada exit the Arlington Property and travel west on the Salome Highway to 339<sup>th</sup> Avenue. The shipment trucks head north on 339<sup>th</sup> Avenue to the I-10 West.
- Shipments to New Mexico exit the Arlington Property and travel west on the Salome Highway. The shipment trucks head north on 331st Avenue to Baseline Road. At Baseline Road, the trucks head east and turn north onto Palo Verde Road. From Palo Verde Road, the shipment trucks connect to the I-10 East and then the Loop 101 North. The trucks then connect to the I-17 north from the Loop 101 to I-40 in Flagstaff.
- Shipments to Texas exit the Arlington Property and travel west on the Salome Highway. The shipment trucks head north on 331st Avenue to Baseline Road. At Baseline Road, the trucks head east and turn south on SR-85. The trucks travel south on the SR-85 until they connect to the Interstate-8 East. They then travel on the I-10 East onto Texas.





 Shipments to Colorado exit the Arlington Property and head west on the Salome Highway to 331<sup>st</sup> Avenue. At 331<sup>st</sup> Avenue, the shipment trucks head north to Baseline Road. The shipments then travel east on Baseline Road and turn north onto Palo Verde Road. From Palo Verde Road, the shipment trucks turn east onto I-10, then north on the Loop 101 and north onto the I-17 to the I-40 in Flagstaff.

The Southern Pacific Railroad abuts the entire length of the Arlington Property on the south. According to the Old U.S. Highway 80 Area Plan Executive Summary, one of the main issues and concerns that affected the outcome of this area plan was to find suitable areas for industrial development. The Old U.S. Highway 80 residents, private and public stakeholders, and community work group members decided to promote employment and industrial land uses near the Palo Verde Nuclear Generating Station and along the railroad tracks. Due to the Hickman's immediate location along the Southern Pacific Railroad, it is puzzling that Maricopa County removed the Hickman's Industrial land use designation on the Tonopah/Arlington Area Plan when it transitioned to the Old U.S. Highway 80 Area Plan in 2007. The site's immediate access to several major freeways and the railroad makes it a prime location for industrial uses.

The Arizona Department of Transportation ("ADOT") is also planning to construct 2 new freeways and a new parkway within 1 mile of the Arlington Property (See Exhibit "1" attached hereto). State Route (SR) 801 is a proposed east-west freeway corridor that would connect existing SR-85 to the proposed Loop 202 (South Mountain Freeway). ADOT is also planning a connection to the proposed Loop 303. State Route 801 West would connect SR 85 and the proposed Loop 303 in the southwest region of the Valley. Proposed construction of the State Route 801 will commence in 2020 and will proceed through 2025. The State Route 801 would be constructed immediately south of the Hickman's Arlington property and would provide an alternative route to the SR-85 and Loop 202 in the southeast valley.

The proposed Hassayampa Freeway will extend north and south approximately 1 mile west of the Hickman's Arlington Property. According to the MAG Interstate 10 – Hassayampa Valley Roadway Framework Study, the Hassayampa Freeway will be a potential Interstate and international trade route that would begin at 1-10 in Cochise County, bypass the Tucson and Phoenix Metropolitan areas, and carry traffic north to a junction with I-15 in Las Vegas. The Hassayampa Freeway could also serve a portion of the north-south CANAMEX International Trade Corridor in Arizona, due to its potential future junction with either I-8 or I-10 to its intersection with US 93 through Wickenburg. This freeway will continue south from I-10 to the Gila River and turn east at Riggs Road to serve the southeast area of Maricopa County and Pinal County. A copy of the Roadway Network Map from the February 2008 MAG study is attached hereto as **Exhibit "11"**.





Based upon the proposed location of the Hassayampa Freeway, the Hickman's Arlington Property will have access to the Hassayampa Freeway from the Salome Highway and the proposed SR 801.

The February 2008 MAG Interstate 10 – Hassayampa Valley Roadway Framework Study shows a Hidden Waters Parkway to be constructed along 331<sup>st</sup> Avenue between I-10 and the proposed SR 801. The Hickman's Arlington Property abuts 331<sup>st</sup> Avenue to the east. The Parkway will allow Hickman's shipments to travel south to the future SR801 or north to I-10.

The proposed Hidden Waters Parkway will provide an additional buffer between the Hickman's property and the Rural-43 subdivision located to the west of 331st Avenue. In order to provide ample construction area for the future Hidden Waters Parkway, the Hickman's were requested at their pre-application meeting to leave a 100-foot setback from the centerline of 331st Avenue when planning future onsite structures and development. According to the Phoenix Valley West Unit 2 subdivision plat, the half-street width of 331st Avenue is 75 feet. By leaving a 100-foot setback from the centerline of 331st Avenue for the future Parkway, approximately 175 feet will separate the easternmost residential lots within the Phoenix Valley West Unit 2 subdivision from the nearest Hickman's structure.

#### 2.8 Natural Preserve

The Arlington Property is essentially isolated from farmland to the east and additional residential homes to the west by natural washes. The Hassayampa River is located immediately east of the Arlington Property and flows south into the Gila River. The Hassayampa River separates the Hickman's Arlington site from agricultural farmland that follows the Gila River. The farmland is located on the north and west side of the Gila River as the River travels west and then south along the Interstate-8. To the northwest of the Arlington Property, the Old Camp Wash, Winters Wash and Coyote Wash flow south from the Belmont Mountains. The Old Camp Wash and Winters Wash merge south of the Salome Highway at approximately 391st Avenue. A portion of Coyote Wash runs directly west of the Phoenix Valley West Unit 2 subdivision. All 3 washes flow south to the Gila River. Together, the Hassayampa River, Gila River and natural washes to the west create a protective pocket that prevents further residential uses to be developed near the Arlington Property.

State land surrounds the Hickman's Arlington Property, the former landfill, the proposed tire recycling facility, and private land to the west, south and north. The State land is designated in blue on Exhibit "1". Federal BLM land is located south of the Gila River and is designated in green on Exhibit "1".





Floodplains and floodways are marked along the washes to the east and west of the Arlington Property. A small portion along the southwest corner of the Hickman's South Arlington property is designated as lying within a 100-year floodplain by the Maricopa County Flood Control District and FEMA.

The Hickman's existing use does not adversely impact the natural environment of the area. Rather, the natural washes, floodplains, and State land surrounding the Arlington property create a natural preserve for establishing an industrial/employment base in western Maricopa County. Residential land uses cannot be developed within the confluence of these natural constraints, thus creating a protective pocket for a substantial amount of Industrial land.

#### 2.9 Existing Water and Wastewater Systems

The Arlington Property is not located within the service area of an existing sewer utility company. Hickman's Egg Ranch utilizes an on-site sewage treatment system with satellite septic locations throughout the site. A majority of the agricultural wastewater generated by the Arlington egg processing machinery is reused for the composting and fertilizer pellet manufacturing systems. Egg processing wastewater not used for composting is stored in evaporation ponds.

The Arlington Property's potable water system consists of 4 private wells and a water tower located on-site. The Arlington site is not located within a certificated water company's service area at this time. The Hickman's have conducted preliminary discussions with the Maricopa County Environmental Services Department and the Subdivision and Infrastructure Planning Program as to whether the Arlington Property water system meets the criteria of a public water system. The Hickman's will be working to comply with Maricopa County's public water system requirements.

# 3.0 MARICOPA COUNTY COMPREHENSIVE PLAN AMENDMENT GUIDELINES

3.1 The Hickman's Comprehensive Plan Amendment Constitutes an Overall Improvement to the Comprehensive Plan and is not solely for the good or benefit of a particular landowner or owners at a particular point in time.

Hickman's Egg Ranch has developed multi-million dollar agri-industrial facilities at its Arlington location over the past 10 years. They are a projected long-term use that has provided long-term benefits for the surrounding area and Maricopa County. With approximately 200 employees, Hickman's Egg Ranch offers diverse and irreplaceable job





opportunities that are unique to the region's agricultural employment base. An Industrial land use designation for the subject property would constitute an overall improvement to the Comprehensive Plan and Old U.S. Highway 80 Area Plan for the following reasons:

- The Hickman's Egg Ranch operation complies with the Industrial land use definition in the Old U.S. Highway 80 Area Plan. The Area Plan defines appropriate uses within the Industrial land use category as "general warehousing, storage, distribution activities, and general manufacturing." As described under the "Existing Uses" subheading of this narrative, the Hickman's agri-industrial operations encompass all of these activities and uses.
- The Hickman's Egg Ranch operation is compatible with adjacent existing and future land uses. The former Hassayampa Landfill to the north is currently being used as a solid waste transfer facility. It is highly unlikely that the Landfill will be developed in the future as a residential land use due to deed restrictions recorded against the Landfill property. If approved, the proposed Hassayampa Waste Tire Recycle Facility to the north will be a compatible industrial use. The Industrial-3 zoned parcel to the southeast would be compatible with an Industrial land use designation on the Arlington Property. Natural washes and state land surround the Hickman's Arlington property, significantly restricting residential development in the area. The Southern Pacific Railroad traverses and creates a barrier between the Hickman's Arlington Property and scattered homesteads to the south. The proposed Hidden Waters Parkway will provide a 175-foot buffer between the Hickman's development and the Phoenix West Unit 2 subdivision. All of these elements create a large, natural island well suited for industrial development.
- An Industrial land use designation for the Hickman's Arlington Property would address one of the local issues addressed in the Old U.S. Highway 80 Area Plan. According to the Area Plan, industrial land uses should be promoted along the railroad tracks. In addition, the Town of Buckeye's General Plan designates land along the Southern Pacific Railroad as Heavy Industrial and Employment Center uses. Buckeye's goal is to keep heavy industrial uses concentrated along the rail line and separated from major residential uses. With the Southern Pacific Railroad located immediately south of the Arlington Property, an Industrial land use designation would promote the goals of the Old U.S. Highway 80 Area Plan and the neighboring Town of Buckeye's General Plan.
- As described under the "Existing and Proposed Transportation Systems" subheading, the Hickman's Arlington property is located in the midst of a major existing and emerging transportation system. An industrial land use typically



Page 15 of 33



requires access to major street or arterial roadways. The Arlington property currently has access to major streets and nearby freeways. The proposed SR801, Hassayampa Freeway and Hidden Waters Parkway will be constructed within a mile of the Arlington Property. Their construction will further enhance and expand the transportation system serving the area.

# 3.2 Whether the Hickman's Comprehensive Plan Amendment will adversely impact all or a portion of the planning area by:

### Altering acceptable land use patterns to the detriment of the plan:

The Hickman's Major Comprehensive Plan Amendment will not alter land use patterns to the detriment of the Comprehensive Plan. As described above, the Hickman's Arlington Egg Ranch is surrounded by a former landfill, a proposed waste tire recycling facility, an Industrial-3 use, State land, and scattered private residences. The Arlington Property is also bounded to the north, south and east by the Salome Highway and Southern Pacific Railroad. The Hickman's request for an Industrial land use designation will not detrimentally alter the Maricopa County Comprehensive Plan or the Old U.S. Highway 80 Area Plan. To the contrary, an Industrial land use designation for the Hickman Arlington Property would spur growth and employment opportunities in the area without adversely affecting residential uses.

# Requiring public expenditures for larger or more expensive infrastructure:

The amendment will not require public expenditures for larger and more expensive infrastructure. On average, approximately 25 shipment trucks access the Arlington site each day. A majority of the trucks use the Salome Highway to connect to the I-10, the Old U.S. Highway 80 and the SR-85. The number of trips generated by the Arlington Property will not require these freeways to be widened or extended. Hickman's has developed its own self contained water and wastewater system.

# Requiring public improvements to roads, sewer, or water systems that are needed to support the planned land uses:

The amendment will not require public improvements to be extended from the Arlington Property to existing roads, sewer and water systems. As described above, the location of the Salome Highway allows the Hickman's shipments to connect to the I-10, SR-85, the Old U.S. Highway 80, and the I-8. The Hickman's will also have access to the proposed SR801, Hassayampa Freeway, and Hidden Waters Parkway. After conducting preliminary discussions with the Maricopa County Environmental Services Department, the Hickman's will be permitted to use their existing on-site septic system with an Industrial





land use classification. The Hickman's are also establishing a public water system for their site. Their existing sewer and water systems will not require public improvements to be extended to the Arlington Property.

### Adversely impacting planned uses because of increased traffic:

The Arlington property is an existing use with major roadway and freeway access. The residences to the west and south are not affected by the Hickman's shipments as they are not located along the Salome Highway. The waste transfer facility and proposed waste tire recycling facility will also generate truck traffic. Any additional structures and future operations related to the Hickman's Egg Ranch use of the Arlington Property will not substantially increase traffic to the detriment of surrounding uses. The projected future employment will not generate any measurable impact on the arterial roadway system.

# Affecting the livability of the area or health or safety of present and future residents:

The Hickman's amendment will not affect the livability of the area or health or safety of present and future residents. Over the years, the Hickman's have worked to mitigate any impact its Arlington operations may have on residences in the vicinity by working to resolve any concerns raised by its neighbors. There are relatively few complaints because Hickman's manages its operations to minimize flies and odors. Some additional landscaping will be installed within the 100-foot setback area along 331st Avenue so as to screen the Hickman's property from the residences within the Phoenix Valley West Unit 2 subdivision. Full landscaping cannot be installed on the Arlington Property due to the rodents and pests that are attracted by the landscaping. The Hickman's will preserve a large portion of their property as bald desert in order to control rodents in the area. Disinfectant chemicals are used to ensure that avian influenza and other bird diseases do not infect their flock. The hen houses are cleaned daily and the manure is spread in a field to compost. The composting field is located on the north and east side of the Arlington property, farthest away from any residential properties and closest to the former landfill. All egg and fertilizer operations comply with County health regulations and safety codes.

The Hickman's Arlington Property is screened from residential development due to the former landfill to the north, the Hassayampa River to the east, and the railroad to the south. The Southern Pacific Railroad provides a wide setback between the Hickman's agri-industrial uses and scattered homesteads to the south. The only feasible area for future residential development would be to the west of the Arlington Property. In 1998, the Phoenix Valley West Unit 2 subdivision was completely vacant with the exception of one home when the Hickman's began constructing the first hen houses at the Arlington site.





# 3.4 The extent to which the amendment is consistent with the specific goals and policies contained within the plan.

The Hickman's Industrial Comprehensive Plan Amendment complies with several of the Maricopa County Comprehensive Plan and Old U.S. Highway 80 Area Plan elements and goals. The Arlington Property was formerly designated as an Industrial land use under the Tonopah/Arlington Area Plan in 2000. With a prior Industrial land use classification, the County has previously validated the Hickman's use as compliant with the Comprehensive Plan Industrial land use requirements.

The Comprehensive Plan elements applicable to the Arlington Property include land use, transportation, environment, and economic development. The following goals have been excerpted from the Comprehensive Plan in order to provide additional support for the Hickman's Industrial amendment and existing use:

#### Land Use

Promote efficient land development that is compatible with adjacent land uses, is well integrated with the transportation system, and is sensitive to the natural environment.

The Hickman's property is surrounded by the former Hassayampa landfill, the proposed Hassayampa Waste Tire Recycling Facility, an Industrial-3 use to the southeast, State land, and scattered private residences. Natural washes to the east and west and state land from all sides further isolate the Arlington Property from future major residential development. Both the Hickman's amendment and the Hassayampa Waste Tire Recycling Facility amendment request Industrial land use designations for complementary uses next to the former landfill. The Arlington Property is also bounded to the north, south and east by the Salome Highway and Southern Pacific Railroad. From the Salome Highway, the Hickman's shipping operations have access to an extensive arterial and freeway system that will be greatly expanded with the addition of 2 new freeways and a parkway. The Hickman's operation is both industrial and agricultural in nature, resulting in a use that is sensitive to the natural environment. An Industrial land use designation for the Arlington Property will protect the Hickman's Egg Ranch existing uses and facilities and will encourage future agricultural-industrial development.

# Encourage innovative and varied approaches to development.

The Hickman's existing use is a truly innovative development. It combines the traditionally agricultural operation of egg production with the high-tech and industrialized operations of egg breaking, egg processing, and fertilizer pellet manufacturing. The Arlington Property contains state-of-the-art processing and manufacturing equipment and





the latest technology to keep their chickens healthy, clean and safe in accordance with HAACP standards. An Industrial land use designation will promote and facilitate further innovative development at the Hickman's Egg Ranch.

#### **Transportation**

#### Identify and accommodate transportation corridors.

One of the objectives under the Comprehensive Plan Amendment Transportation element is to identify and accommodate transportation corridors. The Hickman's are aware of the proposed SR801, Hassayampa Freeway and Hidden Waters Parkway. The future Hidden Waters Parkway will be constructed along 331<sup>st</sup> Avenue, which is the western boundary of the Arlington Property. The Hickman's will provide a 100-foot setback from the center line of 331<sup>st</sup> Avenue in order to accommodate the Hidden Waters Parkway and the proposed transportation corridor for this area.

#### **Environment**

#### Encourage development that minimizes environmental hazards.

The Hickman's development minimizes environmental hazards by reusing wastewater and chicken waste to produce manure and fertilizer. Dust is also mitigated by spraying wastewater from the egg processing operations onsite. By managing their on-site waste and converting it into a profitable commodity, the Hickman's are also implementing environmentally sensitive business practices.

### **Economic Development**

Promote a growing, balanced, efficient, and diversified economy, consistent with available resources, that enhances quality employment opportunities, improves quality of life, and is sensitive to the natural and cultural environment.

The Hickman's Egg Ranch operation is a unique land use that combines agricultural and industrial elements. The Hickman's Egg Ranch has been operating at the Arlington Property for over 10 years and continues to grow with new and evolving agri-industrial uses. The Hickman's business provides over 200 quality jobs to local residents, which in turn, improves the quality of life for the surrounding Arlington area. It is a long-term land use with invested, sustainable practices and an environmentally safe business model that are important to Maricopa County's growth and economy.

### 3.5 Arizona Revised Statutes Requirements



Page 20 of 33



Section 11-821 of the Arizona Revised Statutes regulates Comprehensive Plan requirements for counties in Arizona. Several provisions under Section 11-821 require counties to allow industrial development within their planning areas. Specifically, Section 11-821.B(1) requires the county plan to show the zoning districts designated as appropriate for various classes or residential, business and industrial uses. Under Section 11-821.C(1), the Maricopa County plan shall designated the "proposed general distribution and location and extent of uses of the land for housing, business, industry, agriculture, recreation, education, public buildings and grounds, open space and other categories of public and private uses of land appropriate to the county" (Emphasis added). Finally, Section 11-821.D(2) requires the county plan to include planning for growth areas that are particularly suitable for "planned multimodal transportation and infrastructure expansion and improvements designed to support a planned concentration of a variety of uses, such as residential, office, commercial, tourism and industrial uses" (Emphasis added).

The Maricopa County Comprehensive Plan amendment would fulfill the requirements of A.R.S. Section 11-821 by designating the Hickman's Arlington Property as an Industrial land use category. The majority of the Old U.S. Highway 80 Area Plan is designated with Rural Residential and Open Space land use classifications. The Arlington Property is located within an existing and proposed multimodal transportation area with extensive freeways, arterial roads and the Southern Pacific Railroad close by. Proposed infrastructure improvements, such as the SR801, Hassayampa Freeway and Hidden Waters Parkway will significantly expand the transportation area within a mile of the Hickman's Arlington Property. In evaluating A.R.S. Section 11-821.D(2), the Hickman's Arlington Property is an ideal location for industrial uses.

### 4.0 CONCLUSION

Over the last 60 years, Hickman's Egg Ranch has supplied quality eggs to Arizona families and restaurants. Its business has evolved from producing eggs, to selling liquefied and hard-cooked egg products and to manufacturing manure and organic fertilizer pellets. In order to preserve and protect the existing agri-industrial nature of the Hickman's operations, an Industrial land use classification must be obtained for the Arlington Property. The natural washes, surrounding state land and former landfill to the north limit residential development adjacent to the Arlington Property. The existing scattered residences are buffered from the Hickman's Egg Ranch by the Southern Pacific Railroad to the south and the 100-foot setback required for the future Hidden Waters Parkway along 331st Avenue. The former Tonopah/Arlington Area Plan recognized the Hickman's Arlington Property as an isolated and prime location for Industrial development. Hickman's Egg Ranch requests that Maricopa County reinstate their Industrial land use designation under the Comprehensive Plan Amendment and the Old U.S. Highway 80 Area Plan.



June 2, 2017

As a resident of Tucson, I am strongly opposed to the Interstate 11 corridor from Nogales to Wickenburg as currently envisioned.

I am very concerned about preservation and protection of our beautiful Sonoran Desert, protecting adequate wildlife linkages in Tucson and Pima County, as well as the urgent need for a sensible and appropriate water policy in our desert region. I am also concerned about the economic viability of our region.

Construction of a new highway in the area of the proposed I 11 corridor (Avra Vally) which currently has no transportation or telecommunications infrastructure would cut off essential wildlife linkages, destroy the desert environment and ecosystem, and require huge amounts of fossil fuel and water to build and maintain. It would also harm the economic activities of numerous businesses along Interstate 10. Finally, the construction, maintenance and use of this new highway would add to dust and noise pollution in sensitive wildlife and national and city park areas adjacent to the proposed new highway.

This construction in Avra Valley will inevitably lead to further commercial and residential development along this corridor, exponentially increasing the harm done.

I am not certain that we actually need a new highway at all. Therefore, I urge you to either choose a "no build" option, or plan for an improvement in the current Interstate 10/Interstate 19 using rail, non-fossil fuel energy sources, employing state of the art methods for dust and noise abatement and hiring local labor.

Thank you.



### Comments on I-11 Alignment (Segments I, L, & N and V)

May 25, 2017

I am a sixth-generation Arizonan, GPEC Board Member, Pinal Partnership Executive Board Member, served on the Maricopa County Planning and Zoning Commission for 10 years, and I'm a property owner and developer throughout both Pinal and Maricopa County representing Arcus Capital, Circle G, and Landmark Companies. From the vantage point of those various roles, I can see both the value and impacts of transportation alignment decisions both generationally and holistically to a region. From that, I applaud the effort as a region and a state to partner in making I-11 happen. This will be a massive step forward in international trade as well as a huge boost to our local economies and interconnectedness. With those thoughts in mind I state the following:

- I support the Interstate 11 Environmental Impact Statement and would like to express my support for I-11 segments I, L, and N.
- I support the attached statement by the Pinal County I-11 Coalition as being consistent with segments I, L, and N.
- North of I-10 I support the Hassayampa Freeway corridor established by MAG or segment V. This alignment
  is consistent with the City of Buckeye master plan and will provide maximum leverage of economic
  development opportunity.

#### The Case for Section I/L/N (Casa Grande, City of Maricopa, Mobile and Rainbow Valley):

The City of Maricopa and Casa Grande are both a critical existing and emerging economic development corridor. These areas represent a significant majority of future population growth not just in Pinal County, but in the Greater Phoenix and Central Arizona Region in general. Bringing I-11 through Section I is an ideal way for I-11 to leverage the momentum in that corridor to serve both connectivity and economic development goals. It will also fill in a critical missing link in the effort to make a truly connected regional community between the rapidly growing cities of Pinal and Maricopa Counties.

Echoing the attached Pinal County I-11 Coalition statement, segments I, L, and N are consistent and interconnected with the Pinal County "Regionally Significant Routes for Safety & Mobility" as well as the "Proposed Regional Transportation Authority Projects" or Pinal RTA. There is significant collaboration and support for the Pinal RTA including a major funding initiative that will include support for and interconnection with the I-11 segments I, L, and N.

When comparing the Section I/L/N scenario to the alternative K/H/Q1/Q2 scenario, here are some key considerations.

- 1) Section I/L/N goes through future growth corridors that will include significant economic development for the bulk of the route. This includes growth in southern portion of Goodyear, Rainbow Valley, Mobile Valley, City of Maricopa, and Casa Grande. While the K/H/Q1/Q2 scenario will see activity on the northern leg of SR-85, the bulk of that route will not see growth either because of its route through the Sonoran Desert Monument or because the private land is so far away from the patterns of growth. That route misses the opportunity to bring both connectivity and economic development to the corridors that will see that growth in the coming decades.
- 2) A critical role for the I-11 segment connecting I-8 in Pinal county and I-10 west valley is to connect the significant existing and emerging economic development happening in those two submarkets. The west valley has long been

establishing itself with distribution connectivity to the California Long Beach shipping ports as well as manufacturing. Pinal County in the vicinity of Section I has long been a source of agricultural related manufacturing but is now emerging a source of high tech manufacturing with companies like Lucid Motors. Connecting the distribution strengths of the west valley with the manufacturing strengths of Pinal County will be critical over time. Section I/L/N gives a much shorter, straighter connection between these two critical hubs. This interrelated dynamic becomes much more acute when you look at the holistic function of built out I-11 connecting commerce from Canada to Mexico to everything in between. Because the alternative K/H/Q1/Q2 scenario is much longer in distance and more circuitous, it dilutes and in many ways, disables that connection. The alternative K/H/Q1/Q2 scenario ties into I-10 and SR-85 many miles west of the core distribution hubs in Goodyear, Buckeye, and other west valley economic centers. That would cause traffic from Pinal County to back track dozens of miles losing significant efficiencies and discouraging use of the connection. Section I/L/N, on the other hand, provides direct access to the Loop 303 alignment and Goodyear's Sonoran Valley Parkway Project placing that connectivity solidly in the middle of that west valley economic and distribution activity. This makes the Section I/L/N segment the most ideal and optimized method of connecting two of our state's most critical emerging economic hubs of the Phoenix west valley and Western Pinal County.

- 3) Another key function of I-11 is to reduce core metro Phoenix congestion by creating a method for interstate traffic to bypass metro Phoenix. Perhaps it can be said the best thing we can do to take pressure off the Broadway curve congestion is to get the right I-11 formula. Section I/L/N is a much shorter and much straighter route for that bypass making it much more efficient, desirable, and likely to be used. In addition, it enables traffic that desires to bypass metro Phoenix to go through a corridor with economic activity as opposed to a corridor with minimal economic activity. That way we continue to capture and leverage the economic benefits of that traffic.
- 4) Interconnectivity of multiple transportation corridors is critical. Section I/L/N provides I-11 with the ability to reach a critical interconnect with the future Loop 303 and Goodyear's Sonoran Valley Parkway Project. The alternative K/H/Q1/Q2 scenario eliminates this critical interconnectivity opportunity. (See the attached exhibit.)
- 5) While point #2 above addresses specifically the economic and commerce corridor value connecting western Pinal County and the Phoenix west valley, there is a bigger picture consideration. That is the concept of a truly connected regional community. When you look at the transportation system as a whole that connects the expansive metro of Maricopa County and Pinal County cities, there are many weak points. But arguably the greatest weak point of all is the inability for residents in western Pinal County to access the west valley. In terms of creating a truly connected metro regional community, this is a critical flaw. While the alternative K/H/Q1/Q2 scenario does provide a route, it is so long and circuitous that it is functionally not practical. We know this because it uses the existing roads of I-8 and SR-85. We can see today how that route is actually used, or better said, not used. Use of that route to access the west valley is minimal because it is so long, out of the way, and impractical. Whether to attend a Cardinals Game, or to visit family in Peoria, or to commute in either direction to a job in the west valley or western Pinal County, the existing transportation system as reflected in alternative K/H/Q1/Q2 scenario makes that virtually unviable for west Pinal County residents. In other words, people don't make that trek now because the exiting route is so long and the alternative K/H/Q1/Q2 scenario relies on those very same roads. That is a major disconnect in connecting the region as a community. Section I/L/N provides a new, much straighter, much shorter route bringing the entire region a major step closer to being a truly connected regional community.

Thank You,	

# Pinal County I-11 Coalition

City of Casa Grande City of Eloy City of Maricopa Pinal County Tohono O odham Nation Sun Corridor MPO

May 23, 2017

Mr. Jay Van Echo I-11 Project Manager Arizona Department of Transportation 1655 W. Jackson Street MD 126F Phoenix, AZ 85007

Re: Tier - 1 Environmental Impact Statement (EIS) I-11 Corridor Study

Dear Mr. Van Echo:

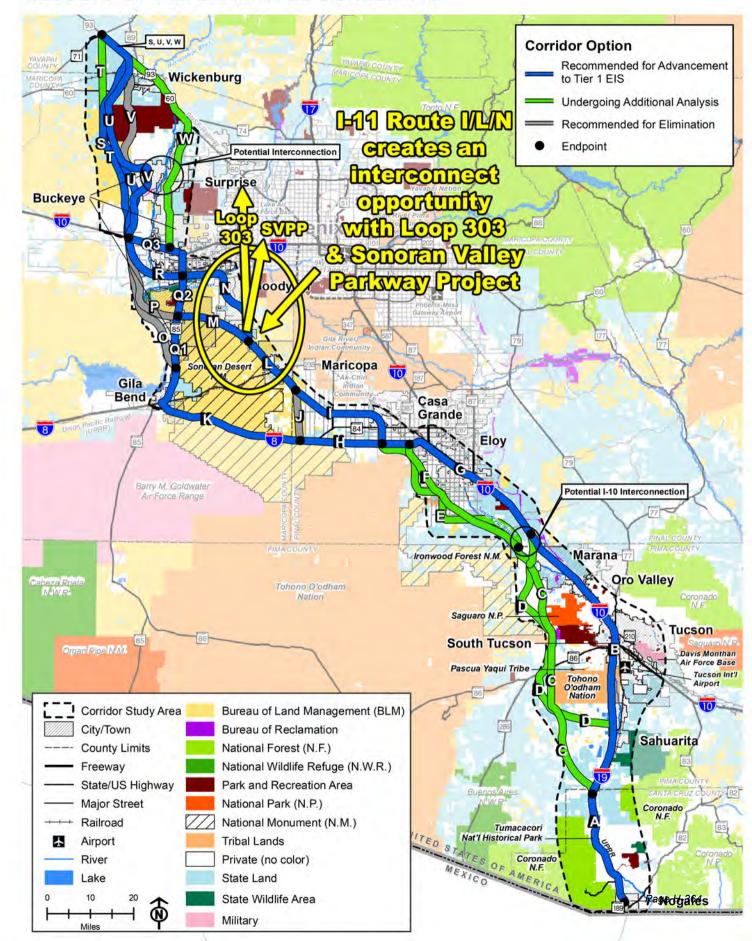
On behalf of the Pinal County Interstate 11 Coalition Board of Directors, we are pleased to declare support of the Interstate 11 Corridor Tier 1 Environmental Impact Statement and provide a preferred alignment.

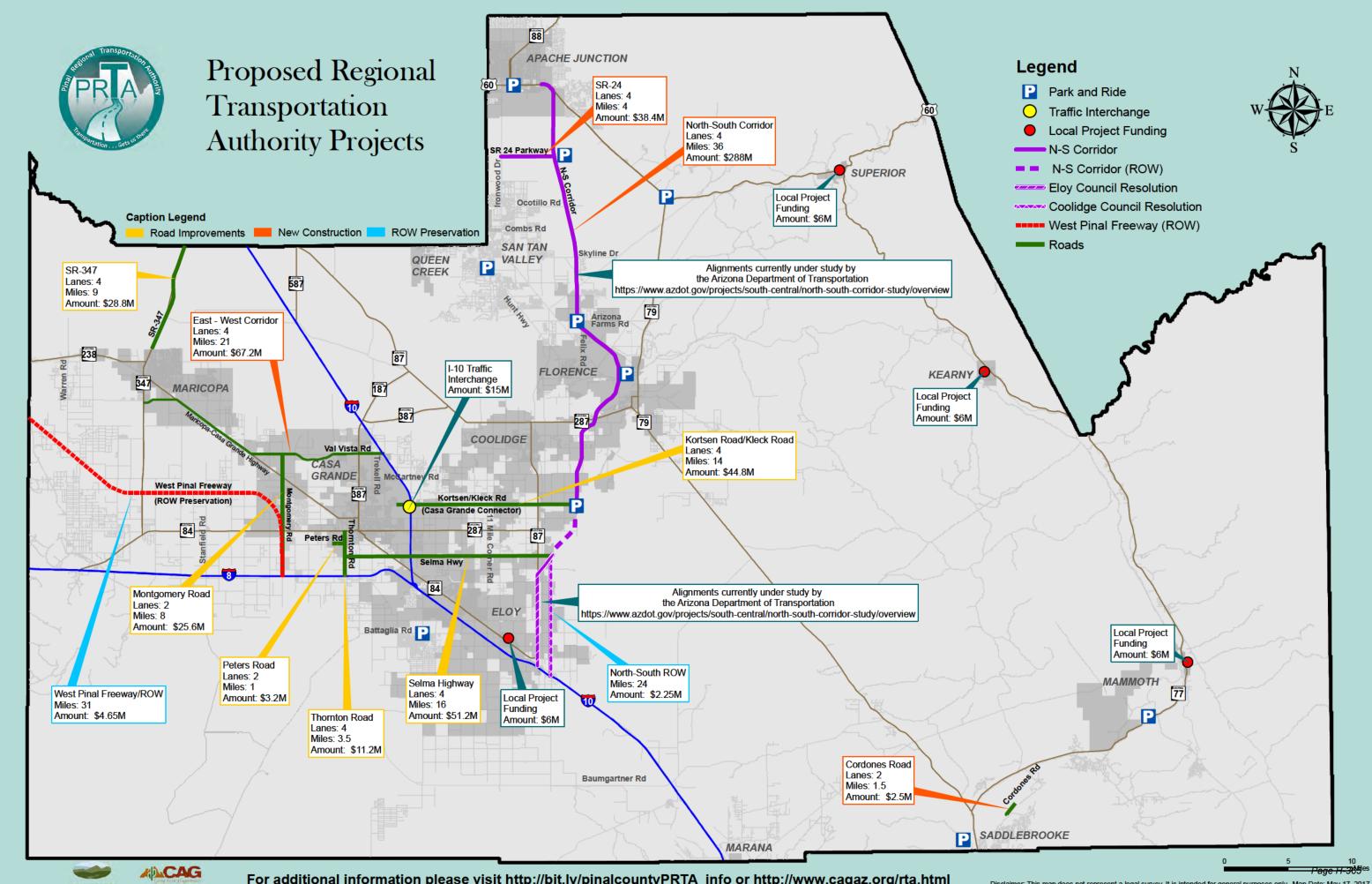
The Pinal County Interstate 11 Coalition prefers the alignment of the proposed corridor as reflected on both the Pinal Regionally Significant Routes and the Pinal Regional Transportation Authority Plans (attached). Additionally, we support, the proposed route of the Sif Oidak District Administration and Planning & Economic Development Departments of the Tohono O'odham Community; as proposed and supported in Resolution No. SODC16-145 on November 17, 2016.

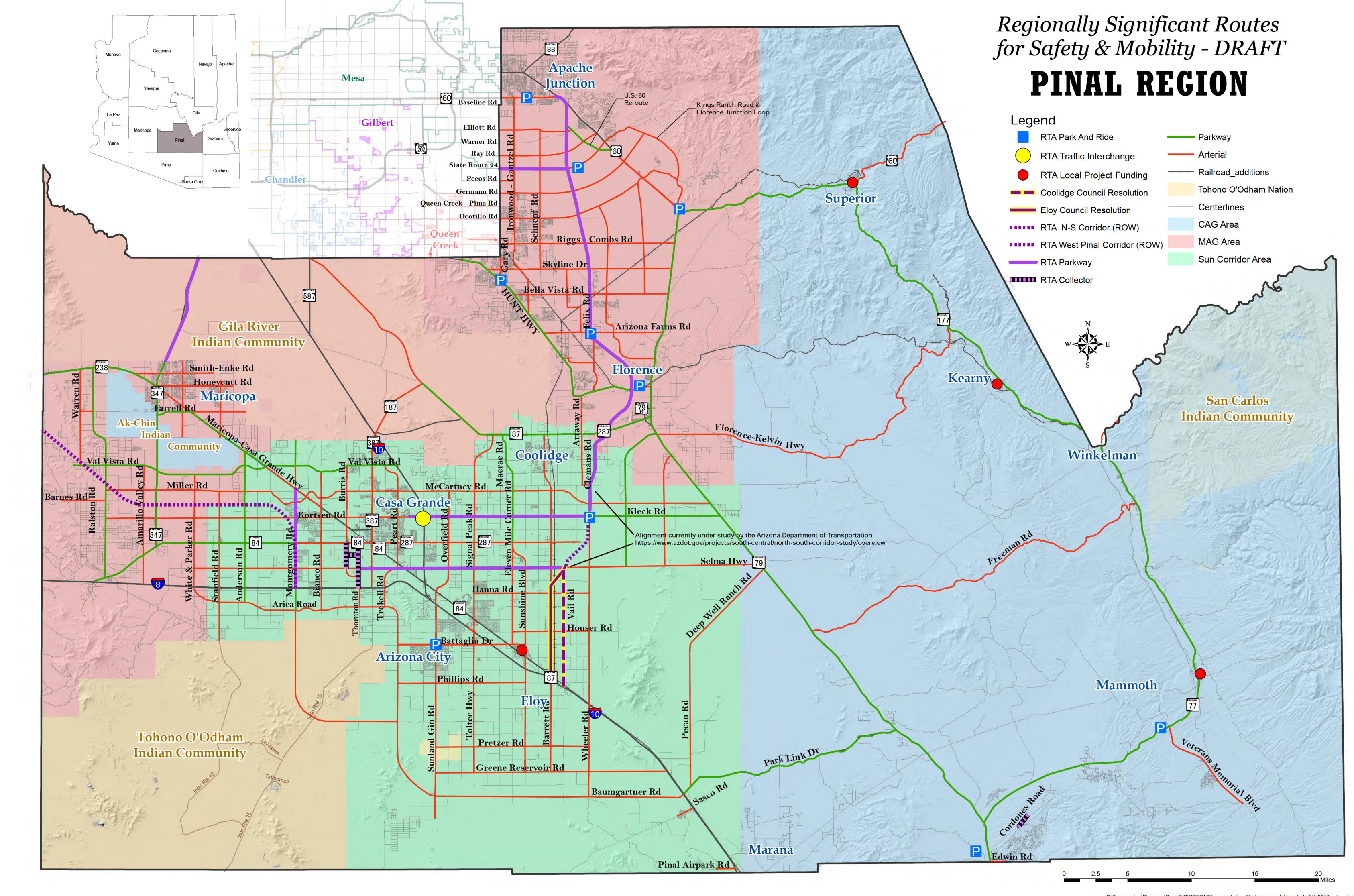
The Pinal County Interstate 11 Coalition promotes freight movement, links communities, and enhances job growth within Pinal County. I would like to thank you and if you should have any questions or need of additional information feel free to contact me at (520) 866-3960.



# RESULTS OF ALTERNATIVES SCREENING







30 May 2017

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

To the Interstate 11 Tier 1 EIS Study Team:

I am writing to oppose all of the proposed Interstate 11 routes through Avra Valley.

I moved to Tucson 5 years ago and I did choose to live west of Tucson near the Desert Museum. My primary objection to the C and D routes is that Avra Valley is a key component in what makes Greater Tucson special. This valley is just 35 minutes from downtown via Gates Pass, 35 minutes from north Tucson via Picture Rocks and 35 minutes from south Tucson via Ajo and Kinney Roads, and it is a wonderful desert world that has not been industrialized. All of the people of Tucson can and do enjoy this valley between two close mountain ranges.

When Tucson residents and visitors come to Avra Valley they find themselves in a quiet desert world surrounded by mountains. From central Tucson they climb Gates Pass Road through Tucson Mountain Park to a historical view area that reveals the pristine landscape of the Sonoran desert. Destinations include Saguaro National Park, Tucson Mountain Park, the Arizona-Sonora Desert Museum, Old Tucson Studios, Ironwood National Monument, and Kitt Peak National Observatory.

The valley also has modest communities of rural homes, ranches, horse properties, agriculture, the geometric pools of the Central Arizona Project, and the Tohono O'odham Nation. Across Avra Valley on top of Kitt Peak we see one observatory of the many that are there, "the most diverse collection of astronomical observatories on Earth for nightime optical and infrared astronomy."

Avra Valley today, with few exceptions, is without grocery stores, gas stations, strip malls, freeways, truck stops, noise and pollution.

All of this will change if an interstate is built through this valley. Not only will it will affect the observatories, the Indian nation and the small communities that currently exist, it will affect the quality of life for everyone who lives in Greater Tucson by replacing a serene nearby destination in the Sonoran desert with light pollution, noise pollution, barrier walls associated with interstates, businesses that line interstates including truck stops, gas stations, and fast food restaurants. It will be a living scar across a treasured serene landscape.

Please protect our desert with its world class museum, national park, mountain park, and historical movie studio that celebrates the history of Tucson and the West.



#### Statement on Proposed I-11 Corridors through Avra Valley



I write in opposition to the proposed I-11 corridors through the Avra Valley in Arizona. Although I now reside in Columbus, Ohio, from 1998 to 2010 my wife and I lived adjacent to the C.A.P. Canal near the North Sandario Road/West Mile Wide Road intersection. During that time, I became familiar with the area and the problems posed by development throughout the Valley. I am particularly familiar with the area from the Tucson Mitigation Corridor south of our neighborhood to the Picture Rocks community to the north, but many of my comments apply to the Avra Valley as a whole. My comments fall into five categories:

- 1. Environmental justice.
- Cumulative impacts.
- 3. Potential for environmental pollution.
- 4. Impact on wildlife
- 5. Degradation of Saguaro National Park and other resources.

#### **Environmental Justice**

From its junction with Ajo Way (Arizona 86) in the south to West Marana Road in the north, Sandario Road provides access to several residential communities. Although there are pockets of relative affluence, for the most part these are low-income communities. Mobile homes are more prevalent than site-built homes, and valuations are considerably lower than average. The area is poorly served by public transportation. The Picture Rocks community, centered on the intersection of North Sandario Road and West Picture Rocks Road, is the highest density area, but even so residential lots are large and the community is spread out. This area has a strong sense of community, with its own community center, schools, and fire department.

Although the poor quality of the corridor maps available on the internet makes a judgment difficult, it seems clear that either of the alternatives through this part of the Avra Valley would have a devastating effect. In the area of Sandario Road from San Joaquin Road to West Mile Wide Road it seems inevitable that a significant number of residences will simply be obliterated by highway construction and the livability of others reduced by noise and air pollution. Areas further to the north are more difficult to judge because of the lack of named streets on the maps, but it seems highly likely that significant parts of the Picture Rocks community will be adversely affected. Homes will be separated from schools, previously quiet neighborhoods will be subject to traffic noises, and air quality will be degraded by diesel exhaust. These impacts will disproportionately and unfairly affect the lives of those whose voices are typically ignored by highway advocates, who never propose highways through affluent communities and for whom the poor are nearly invisible.

<u>Proposed corridors through the Avra Valley do not meet standards of</u> environmental justice.

#### **Cumulative Impacts**

The Avra Valley has been impacted by development for many years. Much of the area has been farmed extensively, with ongoing activity in the northern and southern portions. In the central portion, previously farmed land has been acquired by Tucson Water to protect the valley aquifer and to support its banking of Central Arizona Project water both north and south of the Garcia Strip portion of the Tohono O'Odham Nation, which extends from west to east across the valley up to Sandario Road. Water is banked via several large ponds on the surface, from which CAP water infuses into the underlying aquifer. These ponds are visible from any elevated portion of Saguaro National Park and Tucson Mountain Park. The Central Arizona Project canal itself traverses the valley from north to south, with a power line and service roads along the full length of the canal. Likewise, these are visible from the parks. As previously noted, large-lot residential communities exist at several locations in the valley. Sandario Road is not only an important highway serving residential, commercial, and emergency responders, but a major thoroughfare for drug trafficking.

In short, the Avra Valley has suffered a series of environmental insults that have reduced its serenity and visual appeal, but it has somehow managed to retain something of its former beauty and sense of isolation from the nearby metropolis. The construction of a highway through this area will be the last environmental straw, not only bringing more insults by way of air and visual pollution, but by opening the valley to forms of development it has not previously seen. It is obvious from the history of the Interstate Highway System in the United States that development follows the construction of highways. Ironically, we build more highways to alleviate congestion in existing roads, only to foster more development, more sprawl, and even more congested traffic. The proposed I-11 through

Avra Valley will constitute an environmental tipping point from which there will be no recovery. It will destroy the valley as we now know it.

The proposed corridors through Avra Valley should be eliminated because of their cumulative negative impact on the environment.

#### **Potential for Environmental Pollution**

In addition to the likelihood discussed above that the proposed highway will negatively affect air quality in the valley, there is a distinct danger of surface and ground water pollution as well. Trucks carry many things, including dangerous chemicals, petroleum products, and gasses. And trucks have accidents — whether due to poor maintenance, negligence, reckless or careless driving, or drug and alcohol use. Trucks that have accidents frequently spill their contents onto the highway and surrounding land. Sooner or later there will be such accidents on the proposed highway.

Although it is, again, difficult to judge their routes precisely, it is evident that the proposed highway corridor will pass near, and more likely over, Tucson Water properties in Avra Valley. Thus, the potential exists for spills that find their way into the aquifer on which Tucsonans depend for their drinking water. Moreover, the Brawley Wash traverses the valley from south to north, ending at the Santa Cruz river. Hence, a spill that occurs in one location could, if rainfall causes the wash to run, be easily carried downstream from one place to another. There can be no justification for selecting a highway route that jeopardizes the water supply of a large metropolitan area, particularly when the alternative is to return to mining water underneath Tucson itself, a practice that lowered the water table drastically and contributed to significant subsidence.

On the grounds of danger to water supplies alone the proposed corridors through the Avra Valley should be eliminated from further consideration.

#### **Impact on Wildlife**

When the Central Arizona Project was constructed, the Bureau of Reclamation undertook several mitigation efforts to make sure that the CAP canal did not interfere with the movement of wildlife across the Avra Valley between the Tucson Mountains on the east and various ranges to the west. In addition to providing land bridges that enabled bighorn sheep, deer, javalina, mountain lions, and other wildlife to move back and forth across the canal, the Bureau was required to acquire a 4.25 square-mile tract of land extending from

the Tucson Mountain Park in the east to Sandario Road in the west. This Tucson Mitigation Corridor is subject to an agreement between Pima County, Arizona Game and Fish, and the Bureau of Reclamation that it will be subject to no further development that does not contribute to the purpose for which the Corridor was created.

Clearly an interstate highway through this area will impact the movement of wildlife; it will do so even if mitigation efforts create underpasses to permit wildlife passage. The noise, light pollution, and smells of large trucks moving at high speed will probably degrade the entire area and make it less hospitable for wildlife.

Moreover, the corridors proposed follow Sandario Road through an area that is too narrow for the passage of an interstate highway. Sandario Road, for two miles, separates the Tucson Mitigation Corridor to the east and the Garcia Strip portion of the Tohono **O'odham reservation.** The highway corridor does not have sufficient width to contain a 400-foot-wide interstate highway right of way. Unless the Tohono grant permission to build on the Garcia Strip, or the Bureau of Reclamation violates its agreement with respect to the Tucson Mitigation Corridor, the highway cannot be built. Neither of these developments seems likely.

The proposed corridors through the Avra Valley, and particularly near the Tucson Mitigation Corridor, will defeat the purposes for which the Corridor was instituted and further degrade the wildlife-supporting capacity of the area, and for this reason should be eliminated from further consideration.

#### **Degradation of Saguaro National Park and other Resources**

Tourism is a significant part of the economy of Tucson and Pima County, and Saguaro National Park, Tucson Mountain Park, and the Arizona-Sonora Desert Museum are key attractions for people visiting the area. The museum, along with numerous hiking trails in the parks, provide important recreational opportunities, as well as viewpoints from which one may view an iconic basin-range landscape extending as far as Kitt Peak to the west. Although existing development somewhat impacts views, the addition of an interstate highway in the valley will significantly degrade the view shed.

Kitt Peak is also an important consideration. The site of important astronomical observatories, Kitt Peak already labors under the threat of light pollution from residential and commercial development in the valley. An interstate highway will directly and indirectly worsen the situation. Direct impacts are likely because traffic and the lighting associated with freeway interchanges will immediately make the skies less dark. Indirectly, a highway through the valley will encourage further commercial and residential development and hence also create undesirable lighting. Pima County has an enlightened set of zoning

regulations designed to foster "dark skies," but there are limits to the extent to which lighting can be reduced by such means.

Finally, Saguaro National Park is of national and not merely local importance. Environmental impact studies often look only to local interests and concerns as they examine the potential impacts of proposals such as highway or power line construction. But a thriving Saguaro National Park, with abundant wildlife, typical native vegetation such as the saguaro cactus, and iconic views, is as valuable to a resident of Columbus, Ohio as it is to those who live in Tucson, the Avra Valley, or elsewhere in Pima County. Saguaro National Park is a national treasure. Astronomical research at Kitt Peak is of interest to a national scientific community. A designated wilderness area and wildlife free to move within a viable ecosystem so close to a major metropolitan area are matters of interest and concern to all citizens of the United States.

The proposed corridors through Avra Valley will degrade the visitor experience at the West Unit of Saguaro National Park, Tucson Mountain Park, and the Desert Museum, and thus negatively affect a significant national resource.

#### Conclusion

For the reasons outlined above, I believe that all proposed corridors for Interstate 11 that pass through the Avra Valley should be removed from further consideration. In addition, because I believe that the need for an Interstate 11 project from the Mexican border to Phoenix has not been demonstrated, I favor the "no build" alternative. If subsequent experience should indicate the need for greater highway transportation capacity, the existing Interstates 19 and 10 can be expanded and improved along their current rights of way sufficiently to meet such need. The future of the transportation of goods over long distances lies in the improvement of rail services. Likewise, the movement of people between cities as close as Tucson, Phoenix, and Las Vegas should increasingly depend upon high-speed passenger rail, which is more energy-efficient than automobiles and airplanes and fully competitive with airplanes in terms of time consumed in travel.

June 1, 2017

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

RE: I-11 Alternatives Evaluation; Alternative Routes C and D through Avra Valley

Dear Study team,

Thank you for the opportunity to comment on the proposed alternate routes involving the southern routing of the Interstate 11 through Arizona.

There are numerous reasons why Avra Valley is unsuited for use as an interstate route.

Initially, please understand the Avra Valley is **already in optimum use**. Tourism in Pima County has grown rapidly in the past few years as cited in this recent news article referencing a 2016 study.

"Tourism at Saguaro National Park generated more than \$74 million in economic benefits to the Tucson area in 2016, says a report by the National Park Service.

The report found that the park, with units east and west of the city, attracted more than 820,000 visitors who spent a total of \$52.8 million in communities near the park last year. The spending supported 762 jobs in the area, bringing the reported cumulative benefit to \$74.2 million.

That's a 12 percent increase over the reported economic benefit for 2015, said Saguaro Park spokeswoman Andy Fisher. She said a 9 percent increase in park visitation from 2015 to 2016 was one factor in the improved economic benefit.

Among jobs partially supported by park tourism are some in the hospitality and restaurant industries and professional guiding services, Fisher said.

"National park tourism is a significant driver in the national economy, returning more than \$10 for every \$1 invested in the National Park Service, and it's a big factor in our local economy as well," said Leah McGinnis, superintendent of Saguaro Park. "We are pleased to be a part of such a vibrant community and are glad to be able to give back to the Tucson economy."

The peer-reviewed visitor spending analysis was conducted by economists Catherine Cullinane Thomas of the U.S. Geological Survey and Lynne Koontz of the National Park Service."

The Avra Valley is the home of both the Saguaro National Park as well as the private enterprise "The Arizona Desert Museum" another great draw for tourism. A freeway with the associated noise and pollution of trucking traffic would severely impact tourism on the west side of Tucson.

The Avra Valley, for as wide as it seems, actually has an **inadequate right of way** for the proposed roadway. This route passes between the Tohono O'odham Nation to the west and the Bureau of reclamation's Tucson Mitigation Corridor on the east. The existing width is not adequate to construct the I-11 at this pinch point for either C or D options.

The Avra Valley is **home to diverse plant and animal life** including the Saguaro cactus for which the monument adjoining the valley is named. The animals ranging the area are an integral part of the Southwest's culture and biological health. Large animals such as coyotes, bobcats, javalina and mountain lion require a large land area to travel for food and to meet their basic needs. Building a freeway between the rocky foothills of the Tucson Mountains and the edge of the valley will serve to cut off access to their range.

The proposed routes C and D will have a negative impact on the current residents living in Avra Valley and Picture Rocks. For many years people have moved into the rural areas of Tucson to pursue a way of live that eschews

freeways and fast paced living. Communities such as Picture Rocks and others have sprung up and developed into unique, quirky havens for people choosing this lifestyle over others. Why should development be forced into communities that don't want it? There are sufficient options for building a north south freeway that do not financially, culturally and environmentally negatively impact quite so many. It seems unfathomable that, when looking at the breadth of this whole project, Canada to Mexico that this one little (15 miles as the crow flies) jog west over to Avra Valley, which will cost tax payers millions, is so important. Build the freeway on the existing I10; which already runs north and south through this area.

Thank you for your consideration of my comments.

Sincerely,

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

Comments on Purposed Interstate 11 "Purpose and Need Memorandum – Final" dated February 2017 Corridor Options D, C and B

Following Comments support use of corridor option B:

- Existing right-of-way that meets I-11 requirements of 400' as communicated at the May 2017 public meeting and detailed Section 1.1 of the "Purpose and Need Memorandum". A review of Pima County MapGuide indicates existing right-of-way of no less then 425' (I-10 immediately south of Speedway) plus 100' of existing rail right-of-way and presumable easement for high voltage electrical transmission lines on West Side of I-10.
- Significant savings to taxpayers. ADOT has estimated that double-decking I-10 from Ruthrauff to I-19 would save taxpayers nearly \$2 billion.
- Population and Employment growth appear to be concentrated closer to corridor B as compared to D / C as illustrated in Figure 3-1 of the "Purpose and Need Memorandum".
- Average Travel time for 2015 and 2035 remain at a service level of A for the Nogales Tucson pair as shown on Table 3-2 of the "Purpose and Need Memorandum". (Figure 3-4, "Average Weekday Level of Service, 2035", seems to contradict the previously referenced table 3-4).
- "Economic Center and Employment Densities, 2035" shown in figure 3-10 are all adjacent to I-19 and I-10 and would be better served then the western corridor of E or F.

Following Comments repudiate use of corridor option D or C:

• Lack of right-of-way. As stated in Purpose and Need Memorandum page 1, "... an interstate facility with 4 lanes would have a right-of-way of 400 feet." It appears that no more then an 80' right-of-way for 1.5 mile between the Bureau of Reclamation Tucson Mitigation Corridor and the Tohono O'odham Nation land. When this lack of right-of-way was mentioned at the May 3, 2017 meeting an official with the study group stated that the Bureau of Reclamation had been approached to negotiate passage on this property for the right-of-way. This is a very disturbing prospect. This land was set aside to help mitigate the impact of construction of the CAP. The need to preserve the Eco-System has not changed since this concession was made and to ignore this hard fought concession to the environment is unconscionable.

The Mitigation Corridor connects Pima County's Tucson Mountain Park, the Tohono O'odham Nation Land and the mountains to the west. The I-11 and intermountain West Corridor Study – Corridor Concept Report recognized the importance of the Tucson Mitigation Corridor and recommended a future I-11 be sited along existing I-10 and I-19. The Bureau of Reclamation, Pima County Board of Supervisors, and the Arizona Game and Fish Department recognized the value of this mitigation zone when they previously opposed the proposed I-10 bypass and the SunZia Transmission project through this area.

Corridor option D or C does not materially contribute to Population and Employment Growth
as stated is section 3.3.1 of the memorandum. As shown in Figure 3-1 and "Results of
Alternative Screening" much of the land these corridors pass by are Tribal Lands, National
Parks, National Monuments, Parks and Recreation Areas, and Bureau of Reclamation and are
not available for development.

- Other Desirable Outcomes, Goals, or Objectives as stated in Section 3.2 of the memorandum
  would be compromised. Within Avra Valley and the optional corridors D and C there are
  several areas that support the protection of sensitive tourist attractions, protect environment
  and cultural resources and coordinate federal and state agencies to maintain the integrity of
  wildlife movement. For example:
  - ✓ Arizona-Sonora Desert Museum is a major tourist attraction that contributes million of dollars annually to Tucson economy. The museum is located within the Tucson Mountain Park and Pima County Mountain Park Management Plan addresses mitigation corridor, the museum, visual, biological and cultural resources. I-11 would be in conflict with the county management plan and could damage the environment and sensitive tourist attractions.
  - ✓ Pima County Conservation Lands System Saguaro National Park, Ironwood National Monument, Tucson Mountain Park and the Mitigation Corridor are included in the conservation lands system. The system identifies priority vulnerable species, cultural resources, special management areas, and critical landscape connection. An interstate highway located in Avra Valley would negatively impact these objectives.
  - ✓ Pima County Buffer Zone Areas within one mile of Saguaro National Park, Tucson Mitigation Corridor are designated to provide adequate habitat, foster unimpeded movement of wildlife, and provide aesthetic visual appearance to and from Pima County Public Preserves. I-11 would damage the goals of the Pima County Overlay Zone.

#### Conclusion:

Thank you for your thoughtful consideration. It is my hope that the next phase of the study will consider how the I-11 purposes and needs are served using existing I-19 and I-10 right-of-ways through corridor A and B. How the use of alternative corridor E or F has a negative impact on Desirable Outcomes, Goals, or Objectives as set out in Section 3.2 of the memorandum.

It is also my hope that in the spirit of a democratic society, public meetings are open to discussion. The May 3, 2017 meeting was a recap of the study and was closed to comments and discussion by the over 250 attendees. Having spent time at public meetings in New England, I appreciate the value of public discussion that both challenges and affirms ideas.



## Let Me Interstate <u>Un</u>equivoca<u>11</u>y

Oh God, not another road!

Not another road carving up our dear desert!!

Not another rogue creating further havoc across the landscape where it certainly doesn't need to be.

Not even for The Terrorist of Profit.

Nod to commercialism, except what is the price that will truly be paid? Oh sure, "If you build it they will come..." But how dumb is that? In the current atmosphere there is the plea and promise to create more jobs, yet I really fear we are missing the point of what the future may provide for us. Who are we really thinking of? The totality of our precious and holistic environment needs to be valued with much more consideration.

Not enough to just say "No!!" to this scam identified as Interstate 11.

The perverse concept needs to be disemboweled, eviscerated, cancelled before it comes to further fruition, scattered in separate locations far distant from one another~so as to never congeal again, and then be quickly forgotten about.

There are currently enough transportation modes in place to haul commerce from hither to you without further complicating life in southern Arizona. Forget about Interstate 11 for the sake of the future!



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 1 to 2 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 111 is unacceptable.

### 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.

Large cities such as Chicago have commuter trains in the center of I 94 and other interstates that are well used and provide alternative transportation for all people. New York and San Francisco also have light rails or other trains that service thousands or people every day, so why can't Arizona become move environmentally and technologically friendly.

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,

May 8, 2017

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

RE: 1-1

I-11 Alternatives Evaluation
Alternative Routes C and D through the Avra Valley

#### Interstate 11 Tier 1 EIS Study Team,

Thank you for the opportunity to comment on the alternative routes currently under consideration for I-11. The comments below specifically pertain to Alternative Routes C and D through the Avra Valley.

As I have stated in previous written comments, there are a number of reasons why the Avra Valley is an unsuitable infrastructure corridor and should therefore be eliminated from further consideration:

- · Inadequate public right-of-way
- Negative impacts to the Tucson Mitigation Corridor
  - Negative impacts to the Saguaro National Park
- Negative Impacts to the Tucson Mountain Park
  - Negative Impacts to the Pima County Conservation Lands System
  - Negative Impacts to the Pima County Zoning Code
    - Scenic Routes Plan
    - Buffer Overlay Zone

A discussion of each issue is included below:

#### Inadequate public right -of-way

Both Alternative Routes C and D are proposed to pass between the Bureau of Reclamation Tucson Mitigation Corridor and the Tohono O'odham Nation along the Sandario Road right-of-way. Utilizing Pima County MapGuide and the map associated with the Pima County Road Proceedings Number 0862 (Book 7, Page 44), I reviewed the land ownership along 1.5 miles of Sandario Road which is bordered on the east by the Bureau of Reclamation Tucson Mitigation Corridor, and on the west by the Tohono O'odham Nation.

This research into the existing Sandario Road right-of-way was done to illustrate that Pima County does not appear to control more than 80' of right-of-way along a 1.5 mile stretch between the Bureau of Reclamation Tucson Mitigation Corridor and the Tohono O'odham Nation.

I understand Pima County Administrator Chuck Huckelberry has proposed elevating the I-11 in this location. Without additional right-of-way, I believe 80' is an insufficient width in which to accommodate surface highway or bridging structures let alone any additional infrastructure components such as future rail and/or utilities.

In correspondence with the Bureau of Reclamation, I understand they continue to oppose any further development within the Tucson Mitigation Corridor or use of the Corridor for anything that could adversely affect plants, wildlife, or wildlife movement for which the Corridor was established. Their position has remained consistent through many infrastructure challenges including the recent SunZia Southwest Transmission Project.

Unless the Tohono O'odham Nation chooses to provide right-of-way, I do not believe there is land in this location of Avra Valley that can be utilized for I-11. It is for this reason that I think the potential for right-of-way acquisition is a critical issue.

In contrast to the land ownership situation in the Avra Valley, the other route under consideration for a future I-11 has existing right-of-way already in place. That route is along the existing I-10 corridor.

Again reviewing maps available from Pima County MapGuide, I see that immediately south of the intersection of I-10 and Speedway Blvd. in a fairly narrow section of I-10, there is approximately 425' of existing right-of-way, plus 100' of existing right-of-way for rail traffic, and no doubt an easement for the existing high voltage electrical transmission lines located west of I-10. According to the May 2017 public meeting display boards, I-11 will require 400' of right-of-way. Clearly the right-of-way needed for a future I-11 already exists in this location.

My research indicates that between these two potential corridors for a future I-11, incorporation of a new highway into the existing I-10 alignment, rather than dealing with all the issues associated with acquiring right-of-way in the Avra Valley, is a great deal more economically feasible. As a final note, the economic issues pale in comparison to the environmental impacts of constructing a new highway in the Avra Valley.

#### Negative impacts to the Tucson Mitigation Corridor

The Central Arizona Project Tucson Mitigation Corridor physically and biologically connects Pima County's Tucson Mountain Park with the Tohono O'odham Nation and the mountains to the west. This 4.25 square mile corridor was acquired by the Bureau of Reclamation as partial mitigation for construction of the Central Arizona Project. It is managed by Pima County and Arizona Game and Fish is a third party to the cooperative agreement that states this area is only to be used to preserve plants and wildlife and to provide an undeveloped corridor for wildlife movement. The Bureau of Reclamation, Pima County Board of Supervisors, and the Arizona Game and Fish Department opposed the previously proposed I-10 Bypass and SunZia Transmission Project through this area. The I-11 and Intermountain West Corridor Study — Corridor Concept Report recognized the importance of the Tucson Mitigation Corridor and recommended a future I-11 be sited along the existing I-10 and I-19.

#### Negative Impacts to the Saguaro National Park

In addition to the agencies noted above, the National Park Service opposed the I-10 Bypass and the SunZia Transmission Project in this location due to inconsistencies with the establishment of Saguaro National Park including its designated wilderness area. The National Park Service recommended that an Environmental Impact Statement consider the effects on natural resources including the spread of invasive species and habitat fragmentation, degradation of cultural resources, and visual impacts from sensitive viewing areas such as the Arizona-Sonora Desert Museum. The SunZia Transmission Project subsequently removed this corridor from consideration due to the potential impacts.

#### Negative impacts to the Tucson Mountain Park

The Pima County Tucson Mountain Park Management Plan addressed the Tucson Mitigation Corridor, lease properties such as the Arizona—Sonora Desert Museum, and the management of visual, biological, and cultural resources. 62% of visitors to Tucson Mountain Park visit the Arizona—Sonora Desert Museum and park road pull outs. These areas overlook the iconic Sonoran Desert landscape of the Avra Valley, and an interstate corridor in this location may result in negative impacts to the multi-million dollar tourist industry in southern Arizona.

#### Negative Impacts to the Pima County Conservation Lands System

Saguaro National Park, Ironwood National Monument, Tucson Mountain Park, and the Tucson Mitigation Corridor are included in the Pima County Conservation Lands System. The Pima County Sonoran Desert Conservation Plan identified priority vulnerable species, cultural resources, special management areas, and critical landscape connections that will be negatively impacted by a highway in this location.

#### Negative Impacts to the Pima County Zoning Code

#### Scenic Routes Plan

Local roads such as Sandario Road, Kinney Road, and Gates Pass Road are designated Major Scenic Routes by the Pima County Zoning Code. The intent of scenic routes are to protect property values and the character of neighborhoods; protect and enhance the unique character of a community, including vegetation, architecture and geology; protect and enhance the economic value of tourism; and protect natural resources.

#### **Buffer Overlay Zone**

Areas within one mile of Saguaro National Park, Tucson Mountain Park, and the Tucson Mitigation Corridor are within the Pima County Buffer Overlay Zone which is an area designated in part to asssure the continued existence of adequate wildlife habitat and foster the unimpeded movement of wildlife in the vicinity of Pima County's public preserves, and to provide for an aesthetic visual appearance from and to Pima County's public preserves.

Please consider these issues as reasons why Alternative Routes C and D through the Avra Valley are unsuitable for transportation and other infrastructure development, and therefore should be eliminated from consideration as potential corridors for a future I-11.





Mr. Jay VanEcho I-11 Study Manager Arizona Department of Transportation 1655 W. Jackson Street, MD 126F Phoenix, Arizona 85007

Dear Mr. VanEcho:

Re: Presentation and Consideration of Resolution No. 2043, authorizing official support of the Sonoran Institutes I-11 Design Reports, as presented and as reviewed and approved by the Town's I-11 Transportation Committee

It is to be noted that the Town's I-11 Committee favors an I-11 route crossing existing US 60 west of the Town's Municipal Airport at approximate mile post 101. The I-11 Task Force also recommends that no route in downtown Wickenburg be considered further.

Please see the Town's letter of July 16, 2013, the Town Manager's letter of June 20, 2016, and the Minutes of I-11 Task Force meeting of July 7, 2016.

Sincerely,



cc: Town Council Members
Vince Loriface, Interim Town Manager

Ms. Karla S. Petty, Division Administrator Federal Highway Administration U. S. Department of Transportation 4000 N. Central Avenue, Ste 1500 Phoenix, AZ 85012-3500



Comments on Interstate 11 corridor alternatives presented to the public in May 2017, especially concerning the two unsuitable alignments proposed for Avra Valley

June 2, 2017

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

Also submitted by email: I-11ADOTStudy@hdrinc.com

To Whom This May Concern:

Thank you for this opportunity to comment on Corridor Alternatives as part of the environmental study for Interstate 11 (I-11) between Nogales and Wickenburg. These comments are submitted on behalf of National Parks Conservation Association (NPCA). NPCA was formed in 1919 to advocate on behalf of and in support of our national parks and has more than one million members and supporters.

Our biggest concern is that placing a multi-modal transportation corridor in Avra Valley, which is two of your three route alternatives, would generate huge and unacceptable impacts to Saguaro National Park. We are also sympathetic to impacts to the world-famous Arizona-Sonora Desert Museum, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation Wildlife Mitigation Land, other protected federal lands, the rural character of this part of Pima County, and the sovereign lands of the Tohono O'odham Nation.

We are also concerned that the Tier 1 NEPA process that has been described for the effort won't be sufficient to examine the environmental and social impacts of the Avra Valley routes – surely not enough to make an informed federal decision as to routing. For instance, there is the huge impact to important wildlife migration east to west between protected habitat. If either Avra Valley route is chosen to go forward during the Tier 1 NEPA process, a simple statement that impacts would mitigated would not be acceptable – each mitigation action contemplated must be examined for effectiveness, funding source, etc., and be subject to stakeholder and public review. This is the level of detail that I understand is typical for the next phase of NEPA analysis, and is the level of detail absolutely needed before a corridor selection is made for this particular segment of the proposed Interstate 11.

This begs the question as to why this study is spending so much time, money, and other resources on the Avra Valley routes despite a huge percentage of opposition from valley residents, the fact that such a suggested freeway route has been proposed and rejected in the past, and the seeming impossibility (or at the very least inadvisability) of breaching or impacting the Bureau of Recreation Wildlife Mitigation land.

That particular Mitigation site was set aside to mitigate the construction and ongoing impacts of the Central Arizona Project, and was done so for perpetuity. When I heard at the public meetings that Arizona Department of Transportation is seeking ways to "cooperate" with the Bureau of Reclamation to site a freeway through this land, I was aghast.

Also mentioned was the possibility of building an elevated freeway on pylons along Sandario Road, where the easement is wide enough for pylons of an elevated freeway but not for a ground-level freeway. This is amazingly fanciful thinking. The impacts of an elevated freeway at this location would be greater to the nearby (less than 2 miles) Arizona-Sonoran Desert Museum and Saguaro National Park – to say nothing of the impacts to wildlife using the mitigation lands. I suspect the Tohono O'odham Nation, on the other side of this elevated structure, would probably object as well.

We urge you to consider the total impacts of what you are proposing, which would include at a minimum a freeway, but also opens the door for a transmission line, railroad, etc. You should of course include all the impacts that secondary development a freeway would encourage (gas stations, motels, fast food restaurants, etc.) in your analysis.

By the way, including a transmission line is odd in two ways. First, when transmission lines have been proposed in southern Arizona in the last couple of decades it was clearly decided not to route them along the existing freeways because we were told it would be too hard for maintenance or in case of disruption (if a line fell it would block freeway traffic, for instance). Second, there have been transmission line proposals recently that included a possible Avra Valley routing – but because of this route's impacts and complexity of land ownership (i.e. the Bureau of Reclamation lands) an alternative was selected.

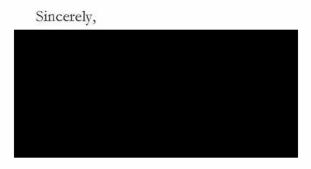
Our concerns with the two potential Avra Valley Interstate 11 alternative routes (and both routes have about the same detrimental environmental impacts):

- The impact it would have on visitors' viewing experience from Saguaro National Park, the Arizona-Sonora Desert Museum, and Tucson Mountain Park.
- 2. The impact of noise it would generates on wildlife and visitors in Saguaro National Park, the Arizona-Sonora Desert Museum, the Ironwood Forest National Monument, and Tucson Mountain Park.
- 3. The added air pollution impacts. Saguaro National Park has a Class 1 designation under the Clean Air Act, and as it stands is not expected to meet future mandatory air quality goals (see <a href="http://tucson.com/news/local/saguaro-national-park-ranks-th-on-list-of-">http://tucson.com/news/local/saguaro-national-park-ranks-th-on-list-of-</a>

most-polluted/article 25b239f4-3fb1-5e7d-adb5-699d7b01fb0a.html and https://www.npca.org/resources/3137-polluted-parks-how-dirty-air-is-harming-america-s-national-parks).

- Impacts of additional light pollution on Saguaro National Park resources and visitors, on astronomy facilities in the region, and on migratory wildlife.
- Impacts to the congressionally-designated Saguaro Wilderness Area located in the park, especially to the wilderness values visitors to this area expect and deserve.
- 6. How increased production of pollutants from this project would contribute to climate change. If there is a per-mile algorithm that is typically used, this route would be more miles than improvement of existing freeways. The resulting development in this rural area would generate a lot more fossil fuel use.
- 7. In the section of the EIS where you look at impacts to endangered and threatened species, the Tumamoc Globeberry (*Tumamoca macdougalii*) should be included. It was formerly listed, but the delisting might be in question now as known populations have crashed. I believe there are properties containing this plant that were bought specifically as mitigation for the Central Arizona Project that could be impacted by the Avra Valley routes.
- 8. While earlier in this letter requested that you include the impacts that would occur from the development of support facilities (such as gas stations and fast food restaurants) and subdivisions that inevitably develop around new highway construction, this is a point we wish to make very strongly. If your plan is to place a highway in this sparsely developed area, impacts from such additional development, including increased demands on water and electric resources, need to be included in your decision-making process.

Again, we appreciate this opportunity to comment on scoping, and look forward to being involved in the NEPA process as it proceeds.



To the EIS Study Team, ADOT and others involved in the I-11 Corridor Comment Team.

On Saturday May 20<sup>th</sup>, 2017 at the corner of Picture Rocks Road and Sandario Road from 9:00 a.m. to 7:30 p.m., myself and several other local community activists held an "Anti I-11 Future Corridor" information table and petition signing rally. Our goal was to raise community awareness about ADOT's proposed routes through the Avra Valley, specifically routes C and D and to listen to the local people's voice regarding their feelings about the proposed routes and how they would be effected both positively and negatively and to capture that sentiment. We are now passing on to you what we heard and saw during that day to be considered as input during the comment period.

We estimate some 10,000 vehicles passed by us that day. That is a conservative rate of 15 cars/minute. All of the four corners at the stop signs had green, red and blue emblems that imitate Interstate signs and read "Future I-11 Corridor" and "Sign Petition Here." All directions of traffic and lanes were exposed to the concept. We started out the day with 1,000 fill out and mail in petition cards and ended the day with 123. Enclosed you will find 325 signed "No I-11, NOT in Avra Valley" cards that OPPOSE ALL ROUTES FOR TODAY AND TOMORROW to include routes C and D. I am sure you will receive many more.

The most common direct feedback we received in order of occurrence was:

- 1. 85%. This proposal goes against every reason we moved to Picture Rocks. We love our rural life, clean air, white noise free environment and starry skies. YES, we INTENTIONALLY came out here to get away from freeway culture and city life. WE ARE HERE BY CHOICE. I would estimate 60 people said they had moved here within the last year and the quiet and solitude of Picture Rocks is what they came for. I know I did. And many more will continue to come if we preserve what they are coming here for. This included new residents from Minnesota, Virginia, North and South Dakota, Illinois (Chicago) and New Jersey that I know of and many more no doubt.
- 2. 10%. WHY? "WHY would they build another highway, we already have an interstate (I-10) that we have been paying for improvements and widening with the infrastructure in place to accommodate option B." "USE WHAT WE ALREADY HAVE." "The idea makes NO SENSE." We now realize in the end this proposal is about MONEY where once again a few people stand to make a lot of money and a substantial number of people are more aware of this than ever.
- 3. 5%. "That goes right over my house". I would estimate some 45 people told me this, some were exposed to the knowledge for the first time and emotions flowed in that moment while little one's sat in the backseat unsure why their parents were all of the sudden so sad. I saw dozens of young couples and their children who had recently moved out to the Avra Valley for the quality of life and affordability.

YOU ARE PROPOSING TO DESTROY A WAY OF LIFE, OUR WAY OF LIFE and we are speaking in our loudest voices that WE DO NOT WANT YOUR INTERSTATE. NOT IN OUR BACKYARD. No to routes C and D.

Sincerely,

The citizens of Picture Rocks, Marana and Tucson.

### Pinal County I-11 Coalition

City of Casa Grande . City of Eloy . City of Maricopa . Pinal County . Tohono O' odham Nation . Sun Corridor MPO

May 23, 2017

Mr. Jay Van Echo I-11 Project Manager Arizona Department of Transportation 1655 W. Jackson Street MD 126F Phoenix, AZ 85007

Re: Tier - I Environmental Impact Statement (EIS) I-11 Corridor Study

Dear Mr. Van Echo:

On behalf of the Pinal County Interstate 11 Coalition Board of Directors, we are pleased to declare support of the Interstate 11 Corridor Tier 1 Environmental Impact Statement and provide a preferred alignment.

The Pinal County Interstate 11 Coalition prefers the alignment of the proposed corridor as reflected on both the Pinal Regionally Significant Routes and the Pinal Regional Transportation Authority Plans (attached). Additionally, we support, the proposed route of the Sif Oidak District Administration and Planning & Economic Development Departments of the Tohono O'odham Community; as proposed and supported in Resolution No. SODC16-145 on November 17, 2016.

The Pinal County Interstate 11 Coalition promotes freight movement, links communities, and enhances job growth within Pinal County. I would like to thank you and if you should have any questions or need of additional information feel free to contact me at (520) 866-3960.



Date: June 1, 2017



I am vigorously opposed to corridor options C and D through the Avra Valley west of Tucson. The environmental and community impacts of a new interstate highway through the Avra Valley could <u>never</u> be adequately mitigated. Instead, transportation planning efforts should focus on expanding the exisiting I-10 and I-19 corridors.

I live in the Barrio Sapo neighborhood on the west side of the Tucson Mountains, near the intersection of Sandario Road and Mile Wide Road. Our neighborhood shares borders with Saguaro National Park West, Tucson Mountain Park, and the Bureau of Reclamation's Wildlife Mitigation Corridor.

#### Options C and D will have a devastating affect on significant part of the Picture Rocks community

Highway construction will bring increased air, noise, and light pollution. People will lose their homes and their quiet way of life, and these impacts will be disproportionately felt by the low-income residents of the Picture Rocks community. Options C and D do not meet standards of environmental justice.

#### Options C and D will have environmental impacts that could never be adequately mitigated

A new interstate through the Avra Valley will sever wildlife migration routes between the Avra Valley and the Tucson Mountains and Saguaro National Park. Viewsheds, dark skies, natural quiet, and other wilderness values will be lost forever.

Because I am so opposed to Options C and D through the Avra Valley, I started an online petition "No Interstate 11 Highway Through the Avra Valley!" (<a href="https://petitions.moveon.org/sign/no-interstate-11-highway">https://petitions.moveon.org/sign/no-interstate-11-highway</a>) that has so far gathered 1390 signatures. I have attached the list of individuals who have added their names to this petition, as well as additional comments written by the petition signers themselves.



#### Petition link: https://petitions.moveon.org/sign/no-interstate-11-highway

SIGN THIS PETITION
Name*
Email*
United States
Address
Address (cont.)
City
State*
ZIP Code*
O'and the analitical
Sign the petition!

Note: By signing, you agree to receive email messages from MoveOn.org Civic Action and MoveOn.org Political Action. You may unsubscribe at any time. [ Privacy policy ]

#### **EMBED THIS PETITION**

<iframe
src="http://petitions.moveon.org/em
bed/widget.html?v=3&name=nointerstate-11-highway"
class="moveon-petition"
id="petition-embed" width="300px"
height="500px"></iframe>

## No Intersate 1 1 Highway Through the Avra Valley!

Petition by Robin Clark

To be delivered to Chuck Huckelberry, Pima County Administrator, Sharon Bronson, District 3 Supervisor, Michael Kies, Arizona Dept. of Transportation, Sondra Rosenberg, Nevada Dept. of Transportation, and Pima County Bond Advisory Committee

Join us in opposing any I-11 highway bypass route through the Avra Valley west of the Tucson Mountains, because the environmental, historic, archeological, and urban sprawl impacts could not be adequately mitigated.

Pima County Administrator Chuck Huckelberry is actively pushing for an Interstate 11 highway bypass through the Avra Valley, despite a Pima County Board of Supervisors 2007 resolution opposing a highway bypass.

Additionally, as part of his I-11 strategy,
Huckelberry has requested \$90 million in Pima
County Bond money for the construction of
another new highway, called Interstate 510,
that would link the proposed I-11 bypass with I10 on Tucson's south side. We urge the Pima
County Bond Committee, as well as the Board
of Supervisors, to reject this request because
many other worthwhile projects would be
imperiled. If this \$90 million proposal is included
in the November 2014 Pima County Bond

# election that goes before voters, we will campaign and vote against it.

There are currently 1,390 signatures. NEW goal - We need 2,000 signatures!

#### **PETITION BACKGROUND**

We are vigorously opposed to any potential highway bypass route through the Avra Valley. The U.S. Bureau of Reclamation, the Superintendant of Saguaro National Park, Arizona Game and Fish, Tohono O'odham Nation, Pima County Board of Supervisors, and hundreds of residents of Avra Valley are already on record as opposing such a bypass when it was proposed back in 2007.

Avra Valley residents are concerned about the damaging effects from a highway bypass such as increased air, water, and light pollution, traffic noise, loss of ancient archaeological sites, urban sprawl, and the forced end of the peaceful and quiet Avra Valley that they chose to raise their families in. The proposed highway bypass would also force 47 Avra Valley and Picture Rocks families from their homes to make room for the highway.

The Coalition for Sonoran Desert Protection, comprised of 41 environmental and community groups working in Pima County, states that the proposed Avra Valley highway bypass would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and the U.S. Bureau of Reclamation's Central Arizona Project wildlife mitigation preserve. The Coalition further states that the proposed highway bypass would block important wildlife movement corridors as identified by Pima County's nationally-recognized Sonoran Desert Conservation Plan, and that such impacts cannot be adequately mitigated.

We urge the Pima County Administrator, Board of Supervisors, and the Arizona (ADOT) and Nevada (NDOT) transportation planners to reject a highway bypass through the Avra Valley because the community and environmental impacts could not be adequately mitigated. Instead, we recommend that transportation planning studies focus on expanding the capacity of existing transportation corridors, which already have the

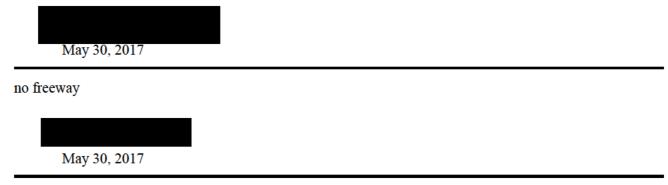
infrastructure (such as gas stations, hotels, restaurants, etc.) to support the traffic along those corridors.

NO!!! to the Interestate 11 Hgway (Avra Valley) I hope you can listen the people who will be affected. Not the rich that looks for their benefits. Thank you. Jun 1, 2017 Jun 1, 2017 Commercial interests shouldn't jeopardize the Saguaro National Park or the Ironwood National Monument. Why spend double the money? I-10 should be the designated route. Jun 1, 2017 Expand i-10 less damage to Sonoran Desert, Saguaro National Park, less expensive, does not dilute DPS, DEA, Border Patrol to monitor 2 major highways. Jun 1, 2017 May 31, 2017 May 31, 2017 We DO NOT WANT the I-11 bypass through Avra Valley! May 31, 2017 It is abhorrent to compromise one of God's supreme creations of nature in Avra Valley. This area is our heart and soul that we will not willingly sacrifice.

Double-deck the I-10. Don't create a new I-11 highway. The pristine Saguaro National Park and nearby Ironwood National Monument have many wildlife moving through our area, including Big Horn Sheep.

May 31, 2017 May 31, 2017 expand I-10 May 30, 2017 May 30, 2017

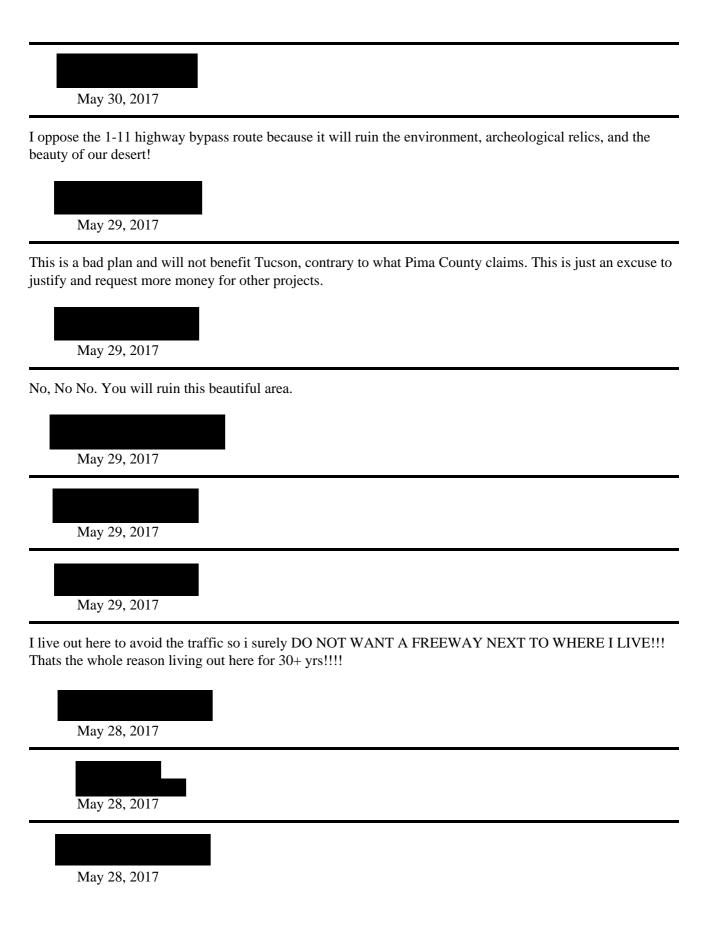
I say no, no, 100 times no. Build the double decker highway it's half the price. Or is that the plan charge more money and ruin people's lives at the same time. Why would you want to distroy this beautiful land out here. Where are the people that are so worried about the environment? Are they aware of how this going to distroy the environment out here in Avra Valley. Are you really going to let money win over LIVES plants, animals and people that have been out here for a century.

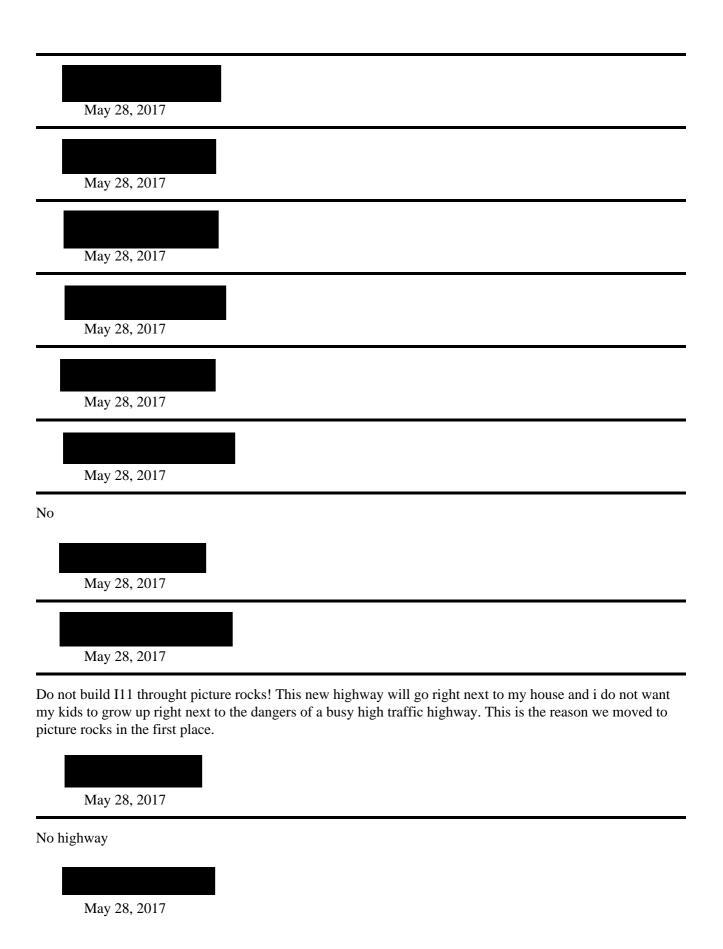


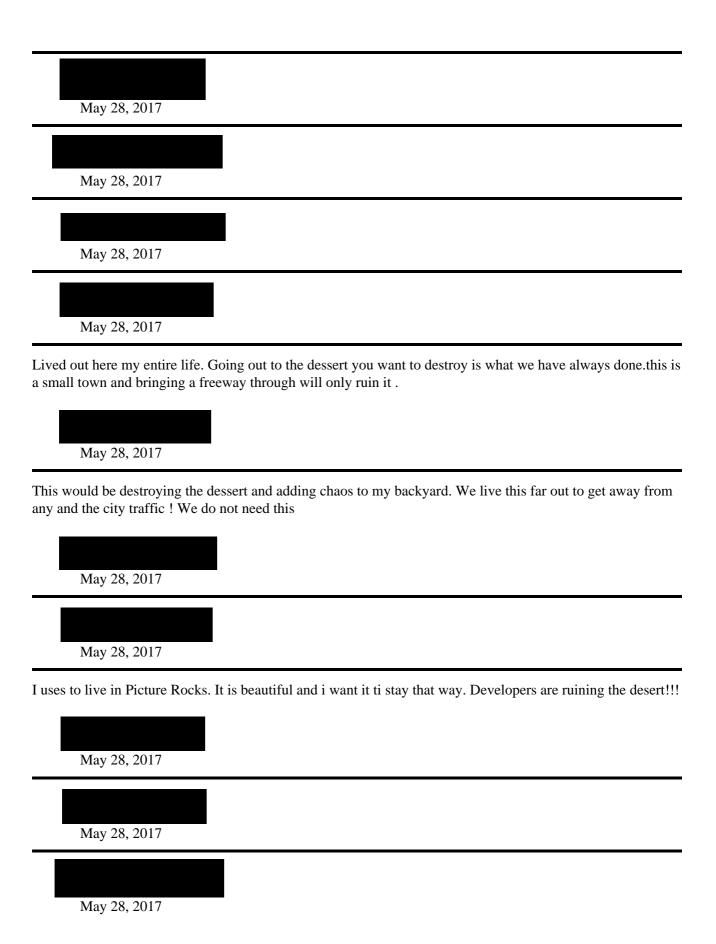
This is too expensive, too unnecessary, and ultimately destructive to our national monument. And what will happen to all of us currently living in homes on location of this "future bypass"?

May 30, 2017

Gary McGuinness Tucson, AZ 85756 May 30, 2017







No
May 28, 2017
Grew up in that area and this is a waste of money
May 28, 2017
May 28, 2017
NO!!!!! run it on the west side of the silverbell mountains maybe it will help cut down on the illegal trafficing out there.
May 28, 2017
May 28, 2017
We moved out of Tucson to to get away from the city. How long before this freeway brings gas stations, McDonald's, new housing developments in an already flooded housing market, and the inevitable Walmart? Can we not keep any desert in Arizona???
May 28, 2017
I vote no
May 28, 2017
May 28, 2017
No!!!!!!

May 27, 2017 We moved to Picture Rocks to get away from traffic! This would kill our cute little town!!! May 27, 2017 May 27, 2017 May 27, 2017

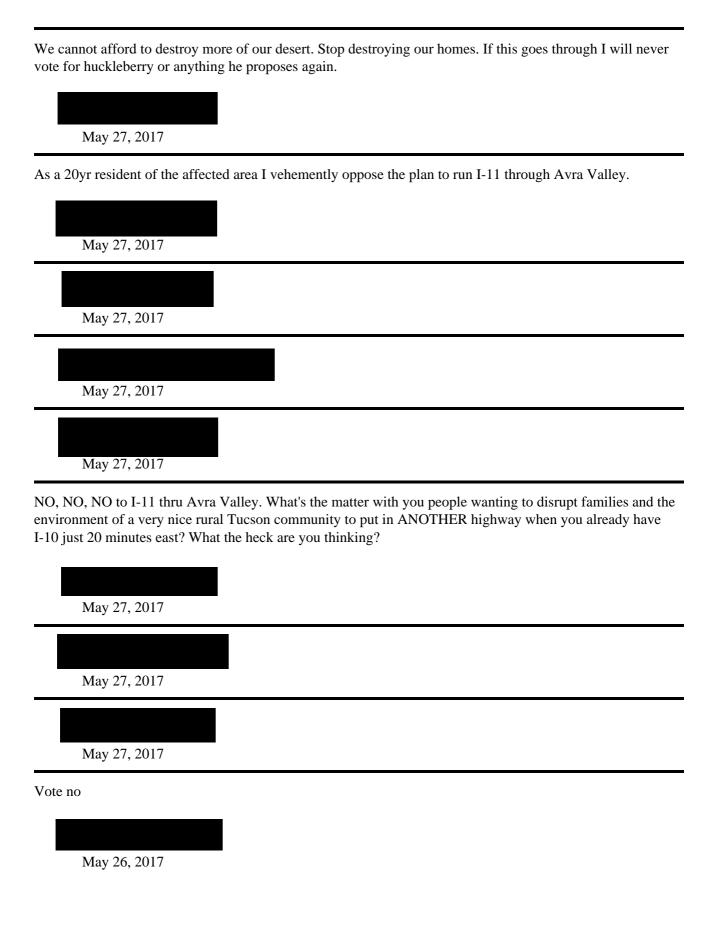
I do not favor any highway route through Avra Valley. Trapped pollution impacting air quality and water reservoirs that service Tucson drinking water. Light and air pollution catastrophic to Kitt Peak and its scientific and economic importance. Catastrophic environmental and economic impact on Saguaro Forest already compromised ecosystem (Science, photographers, motion pictures, tourists). Cost of displacing homes & probable lawsuits. Payment for land when we already own I-10 land route

May 27, 2017 May 27, 2017 May 27, 2017

I sis not move out of the city of Tucson, just to have a highway built across the street from my house. Not only that but I will no longer be able to forage for the mesquite beans for flour. Our home if this goes through will only be at the fair market value of \$45,000. That will not be able to cover the rest of the debt that is owed on this home (approximately \$70,000). If this goes through our family will have to live on the street and we will have to sell our goats and chickens. That is something I don't want to have to do. My husband and I are against this proposed building of a new highway!

May 27, 2017

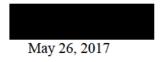
May 27, 2017



No to I-11 and Chuck Huckelberry and ALL it's destruction to the environment and wildlife while I-10 minutes away and capable of improvements for additional traffic.



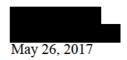
Bad economics for Tucson, as the city would be bypassed. Expand the existing corridor to keep the money flowing in and through the urban core. What more, I want to share that same sunset view from Gates Pass with my grandchildren.



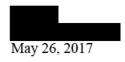
No new highway needed!! Leave our desert alone!!



We need to preserve what beauty we have left in Tucson, AZ.

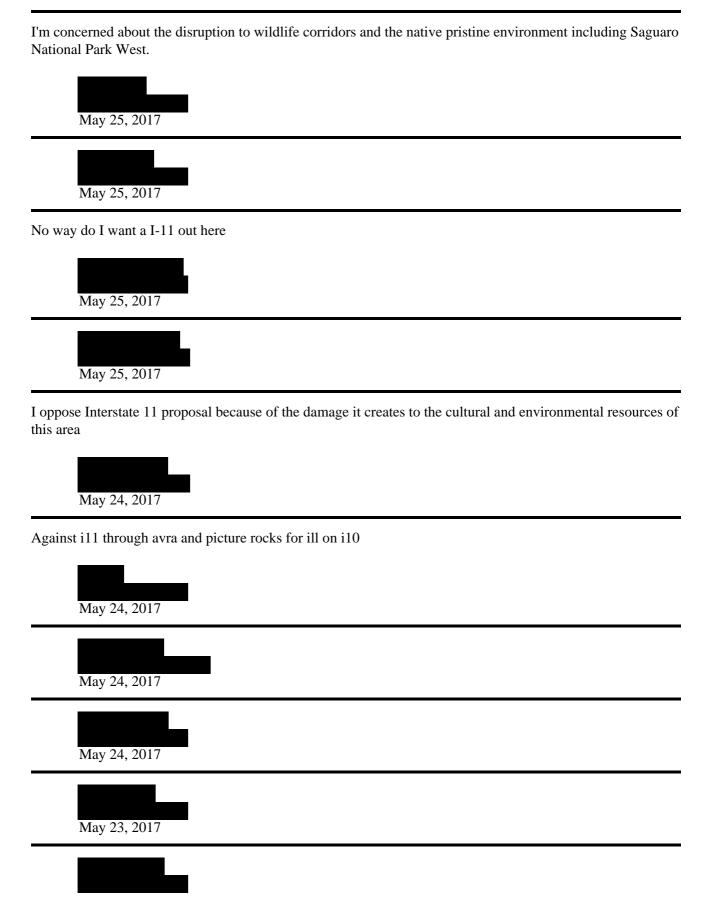


No to I-11 and Chuck Huckelberry and ALL it's destruction to the environment and wildlife while I-10 minutes away and capable of improvements for additional traffic.

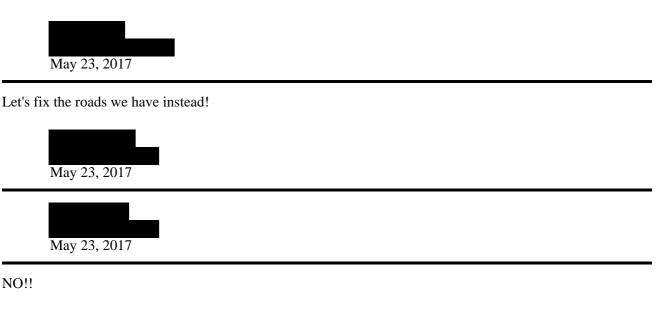


We live approx 2 miles from the proposed route off of Manville. We are terrified of the impact the highway will have on wildlife that are protected in our parks, desert museum; this is the wild wild west out here. The last special space. Our dark skys will be gone. Our quiet will be gone and our properties will loose their values. Our community thrives on the beauty out here. Please take your highway somewheres else!! Thank you, Concerned Neighbor





I-11 should use the existing route through Tucson. ADOT and FHWA have said it is highly feasible, just more expensive. The cost of putting it through the AVRA Valley and wi ding between parks, monuments, and critical habitat connections is too high. The No Action alternative is really the best choice. We don't need the kind of growth it will bring and we especially don't need the sprawl. We need to fix the roads we have, not build new ones.

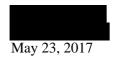


Are you kidding, this is a travisty to the residents who have lived there and to the environment. Stop now!!

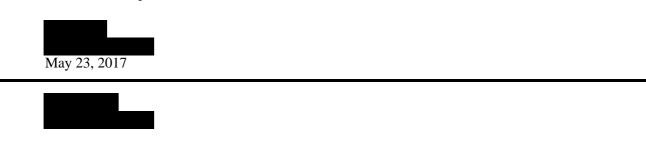


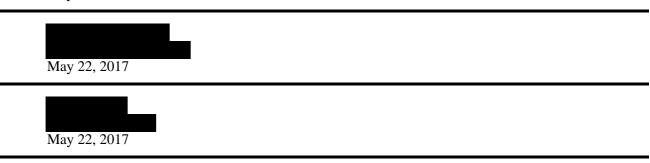
May 23, 2017

This would negatively impact my son's home and land values, not to mention the negative impact on the environment and wildlife . This must be stopped!



Please don't ruin this important environmental corridor.

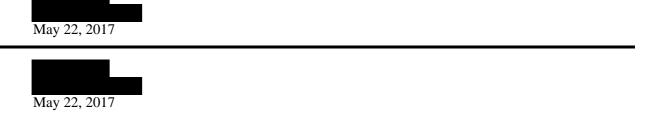




This will irrevocably fragment and destroy sensitive habitat and wildlife movement corridors in the Avra Valley where bighorn sheep from the Silverbell Mountains have been documented traveling to the Tucson Mountains. Use the existent ROW along I-19 and I-10 and build up. Meanwhile, if there was rapid transit between Tucson and Phoenix, there would likely be no need or purpose for this costly boondoggle. Just say NO!



We don't want this I-11 in the Avra Valley area.



Stop Huckleberry and his stooges` lawlessness.



Saguaro national park does not need this much pollution. Its wouldn't survive. Please find another route.



The proposed I-11 bypass would seriously undercut all the investments and coordinated efforts to conserve the valuable natural and cultural resources abundant in Avra Valley. It would significantly facilitate urban sprawl in Pima County and degrade the quality of life celebrated and highly valued by residents and visitors to SE AZ.

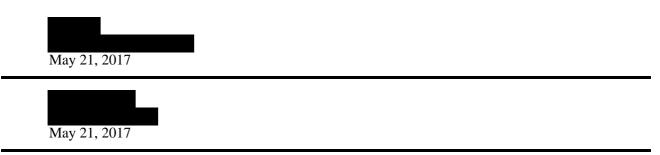




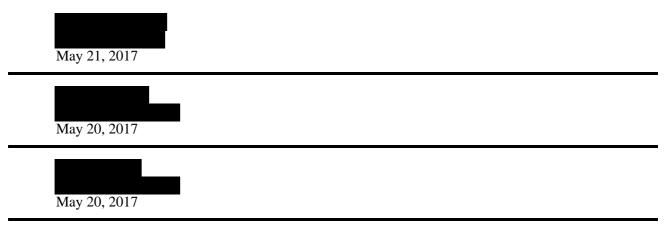
For southern Arizona, I-11 in Avra Valley is not in the best interest of our environment, our quality of life, or long-term economic vitality. Million\$ would be wasted revisiting multi-species conservation permits, attempting mitigation, and on other legal battles.



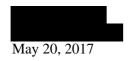
The one reason we all moved out here was to get away from the city hustle and hassle. Please DO NOT build a freeway through our peace and quiet.



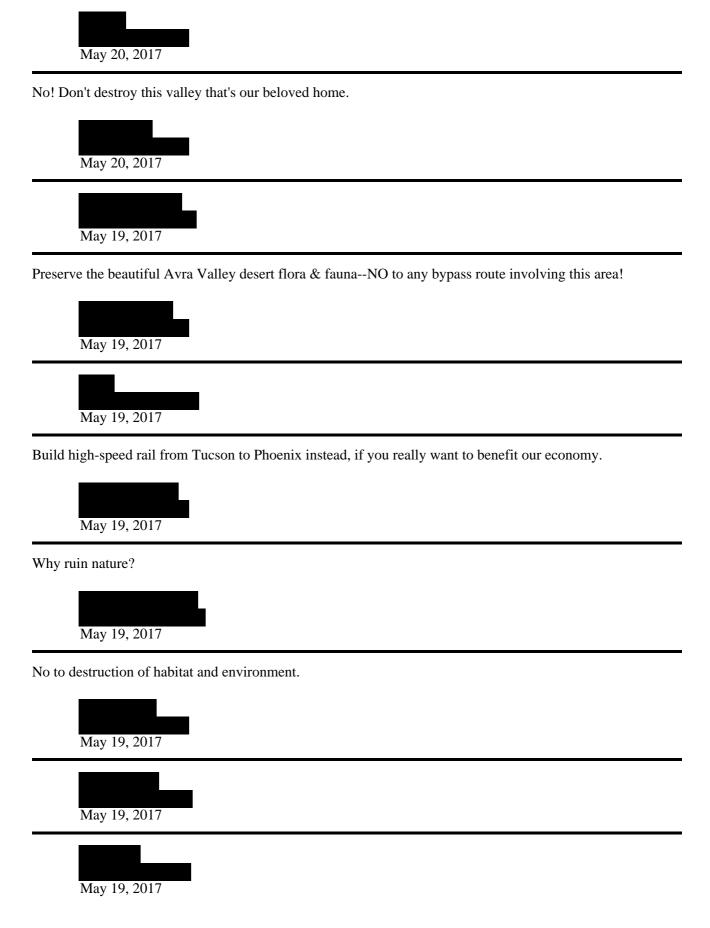
We do not need a freeway system through our pristine sonoran desert. Why not simply expand the capacity of I-19 and I-10 (that already are continually under construction).



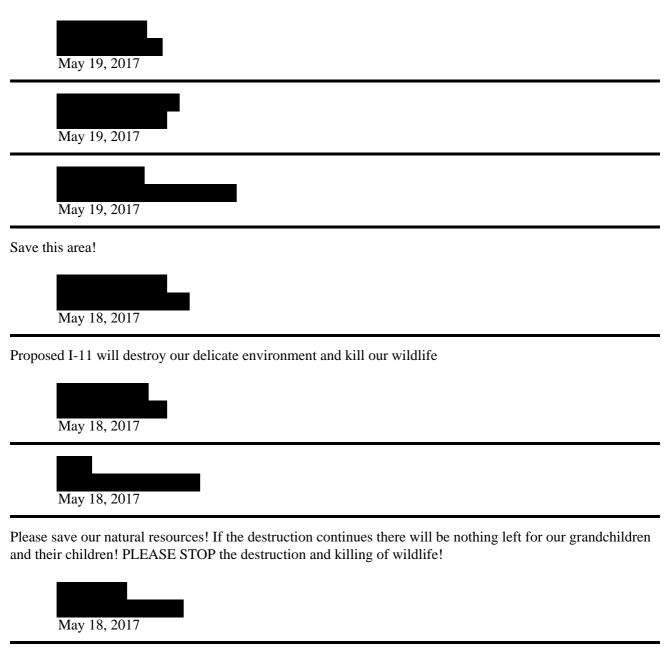
Apart from damage to the environment and tourism, the proposed highway would do economic damage to the businesses already located along the I-10 corridor.



I will ruin our community.

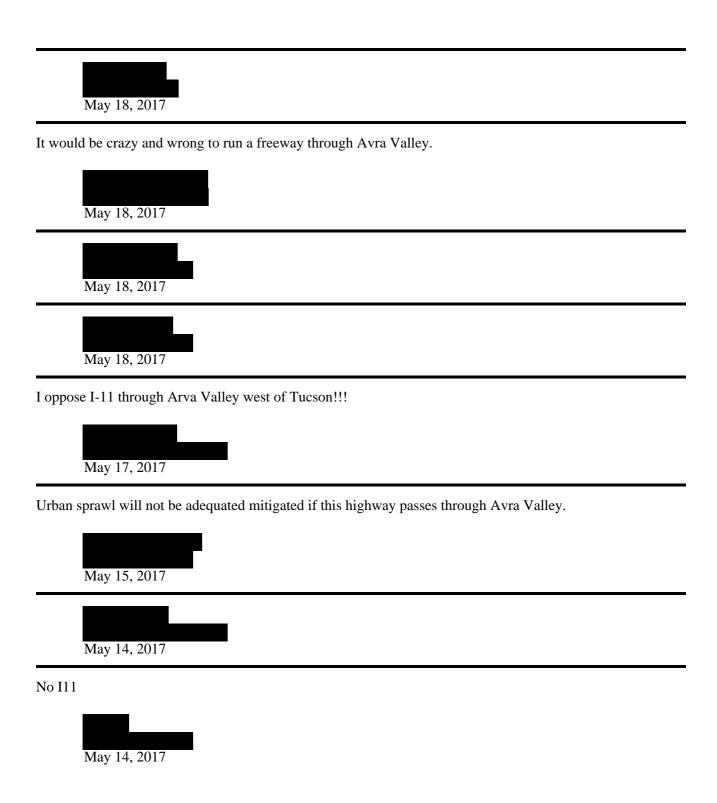


I DRIVE UP AND DOWN I-10 EVERY DAY AND THE TRUCK TRAFFIC I CURRENTLY SEE DOES NOT WARRANT A BYPASS. I'D RATHER PAY FOR A DOUBLE DECKER I-10 THAN HAVE A FREEWAY OUT THERE.

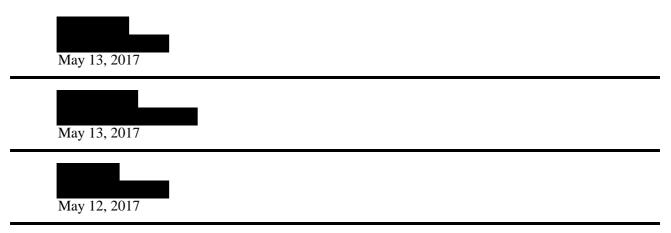


May 18, 2017

May 18, 2017



Please don't ruin the peaceful Avra Valley with an interstate. All this does is please special interest (Chuck Huckelberry and Mr. Diamond of the Diamond-Bell Ranch property, neither of who needs more money, they are just doing it out of greed). It would bring crime and pollution to a place that is still relatively clean. It would also ruin great views from vista ramadas at the Arizona-Sonora Desert Museum (who wants to see that in the distance?) and it would bring noise and ugliness to Saguaro National Park West. It would also endanger wildlife and create unsafe habitats. Please just add it to the existing I-10 as that would be less expensive and less destructive.



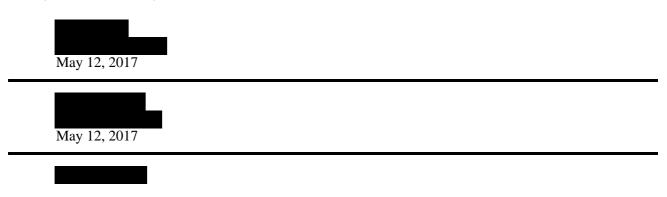
This proposal would hurt countless families. There are alternatices that will work, without taking our HOMES. We love rhis valley and all its desert beauty. We moved here to have a quiet life style and some space. I will fight this every step of the way. You should not have the right to take from one and give to another, just to save them some commute time. I will be hiring an eminate domain atorney.

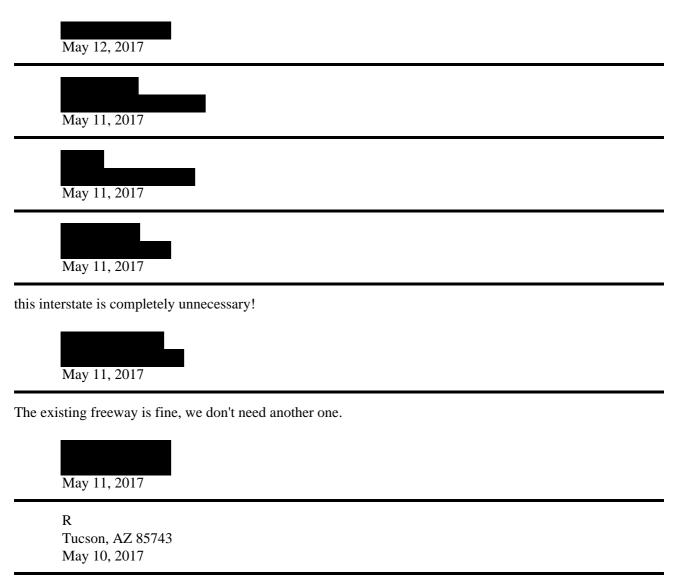


Enough is enough! We do not need to pave the world. The natural beauty needs to be preserved - or we as humans will perish.



Putting an interstate through Avra Valley would have a negative impact in the Avra Valley area. It would destroy the natural beauty of the Sororan National Forest.





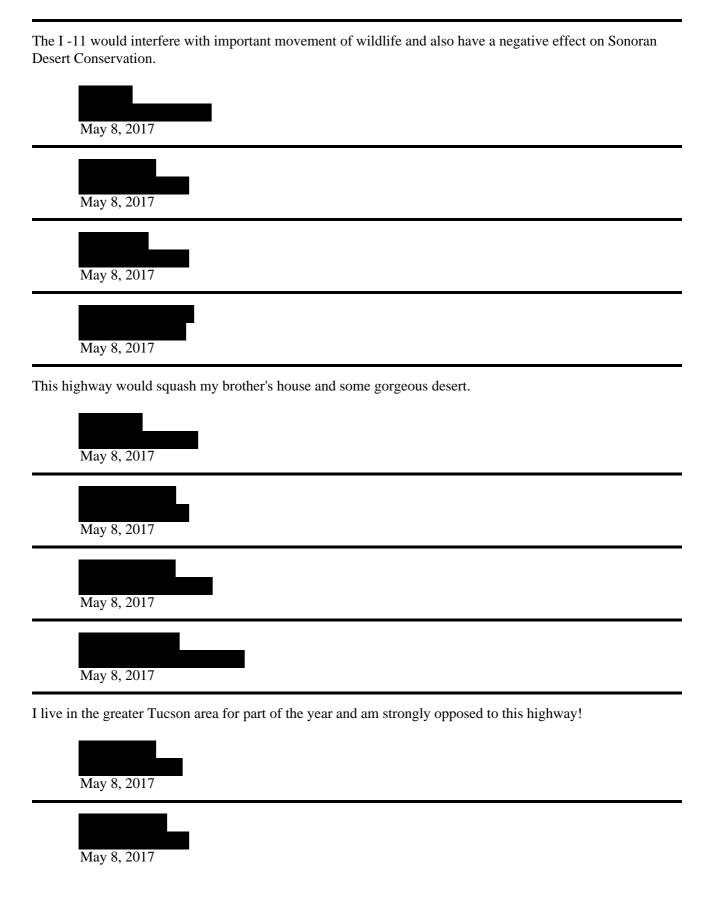
To put I11 through the Avra Valley is unconscionable, when considering the environmental, historic, archaeological and urban impacts, not to mention thousands of displaced homeowners, lost tourist revenues, and the destruction of one of the last significant areas of sonoran desert. Edward Abbey would be rolling over in his grave!! Let's start electing smart not greedy politicians. Follow the money.



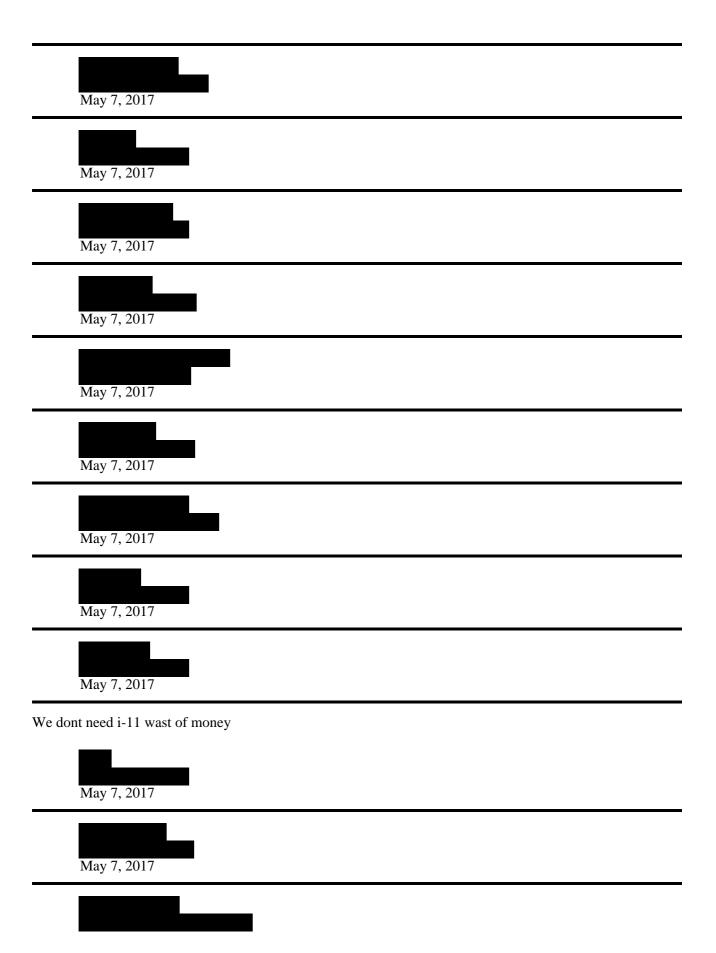
Leave the desert alone and untouched!

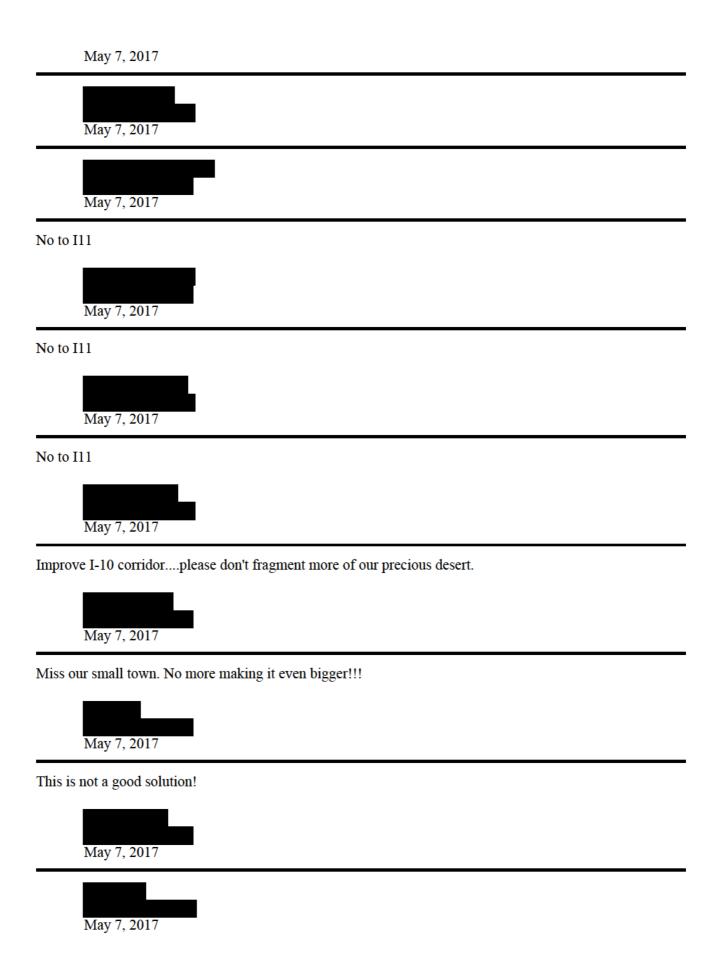


Absolutely ridiculous idea and will fight this tooth and nail.Do not senselessly ruin this special part of Pima County. May 10, 2017 May 10, 2017 May 9, 2017 May 9, 2017 I moved to Avra Valley to get away from industry, pollution, noise, and the cacophony of life. This will destroy Avra Valley. Build the wall! Not another drug corridor! May 9, 2017 May 8, 2017



I oppose the route through the Avra valley. May 8, 2017 This proposed interstate would be a blight on our area and all of Arizona. May 7, 2017 The proposed route is bad for people and wildlife. This is not progress. Conveniences Nd amenities should not come at such a cost. May 7, 2017 May 7, 2017

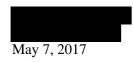




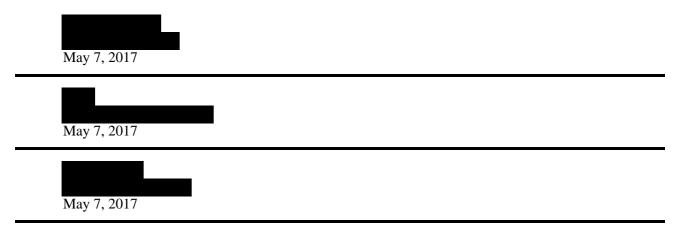
Save our deserts. Please



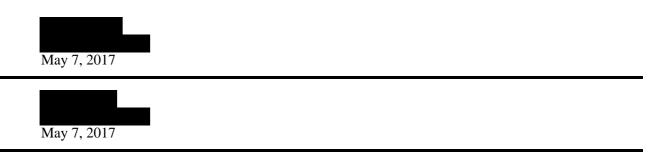
This is the last thing we should be spending tax dollars on.



the proposed Avra Valley highway bypass would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and the U.S. Bureau of Reclamation's Central Arizona Project wildlife mitigation preserve. The Coalition further states that the proposed highway bypass would block important wildlife movement corridors as identified by Pima County's nationally-recognized Sonoran Desert Conservation Plan, and that such impacts cannot be adequately mitigated. I want to be able to visit these natural areas on existing scenic drives, not an interstate that locals don't want either.



Appose any I-11 bypass route through Avra Valley west of the Tucson Mountains.



Why not widen existing freeways instead of destroying yet more land? This proposed route is unneccessary and ill-conceived.

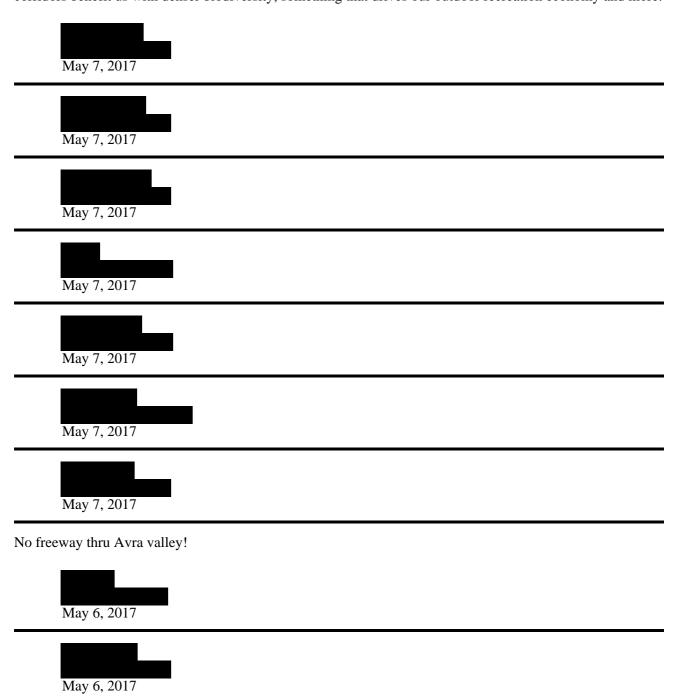


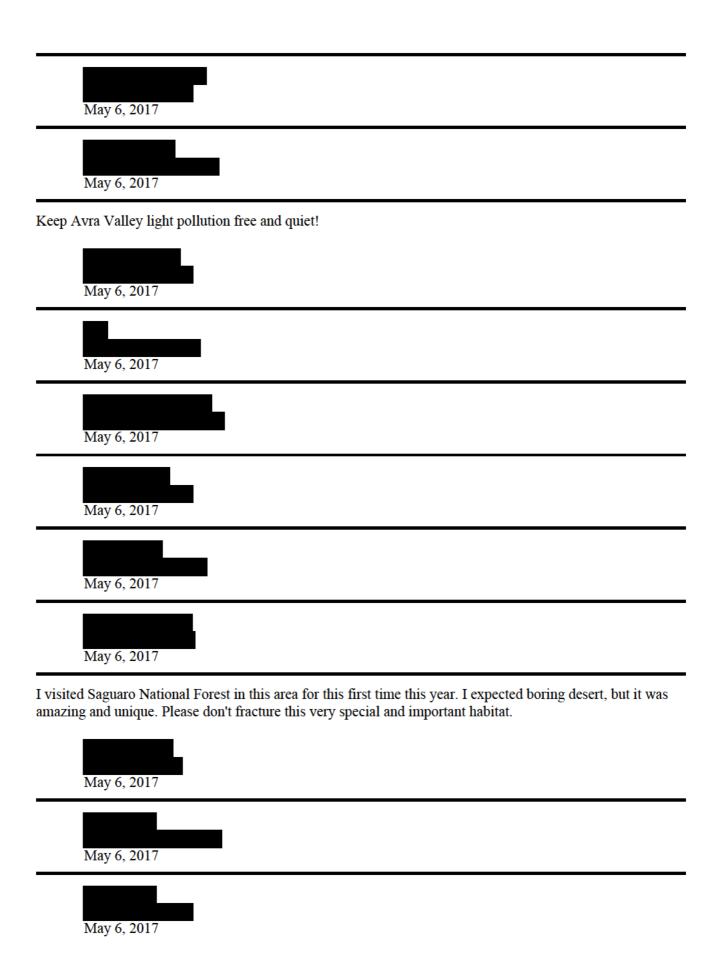
Too much traffic for such a nice quiet area. Too much money for an interstate most would never use.. May 7, 2017 I am extremely opposed to the I 11 corridor it will go right through my personal property. It is disgusting that you people would rape the land of its beauty and serenity. Why don't you spend the money on Pima County roads all over Tucson that need to be fixed. May 7, 2017 May 7, 2017

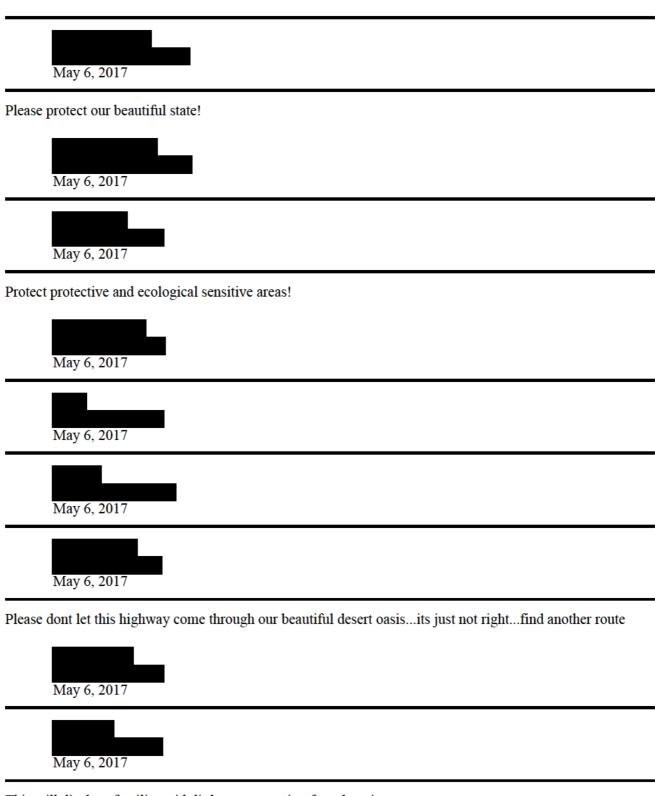
More highways equals more driving & cars equals more pollution. I moved to Tucson from Chicago partially because it wasn't inundated with highways.



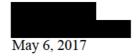
There are many alternative options that would provide what we need for trade commerce and open spaces, please consider developing an alternative plan and NOT building a highway through Avra Valley. Wildlife corridors benefit us with denser biodiversity, something that drives our outdoor recreation economy and more.

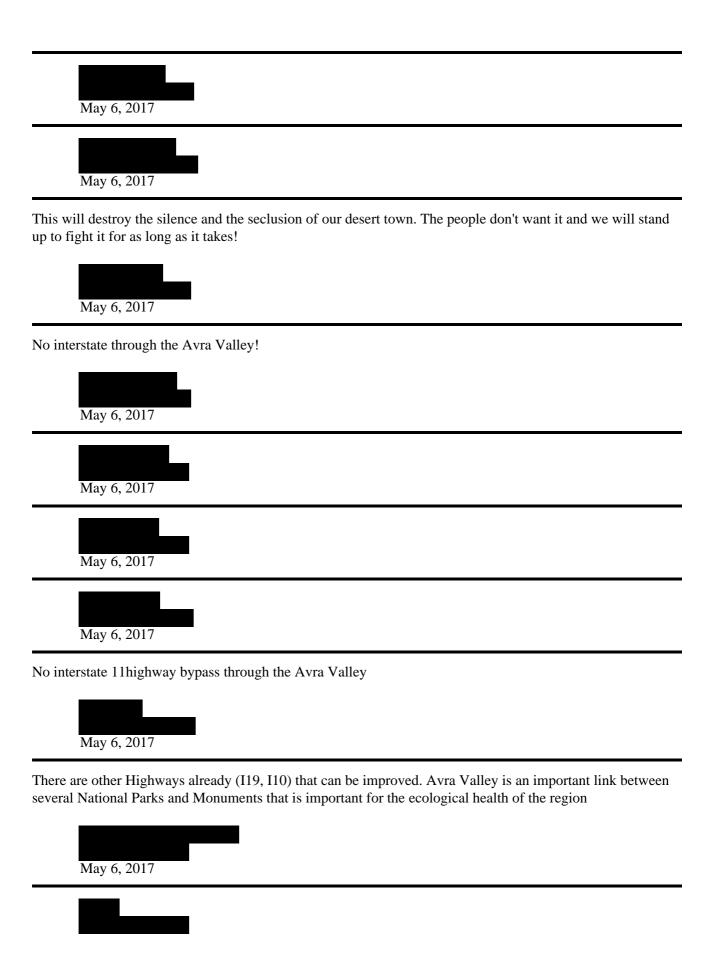






This will displace families with little compensation for relocation.





Please oppose the building of Interstate 11 through the fragile Sonoran Desert ecosystem. Please join me in favoring the expansion of interstate 10 as the best plan.



Do not disturb the wildlife and the beauty that people that come to visit Arizona see









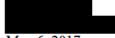
May 6, 2017



May 6, 2017



May 6, 2017

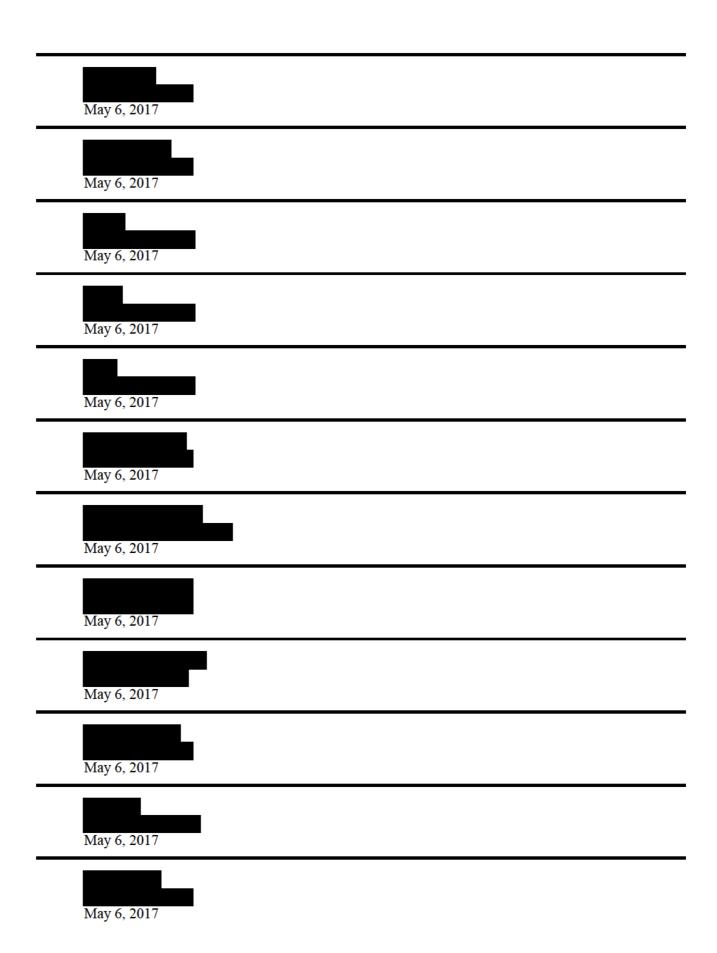


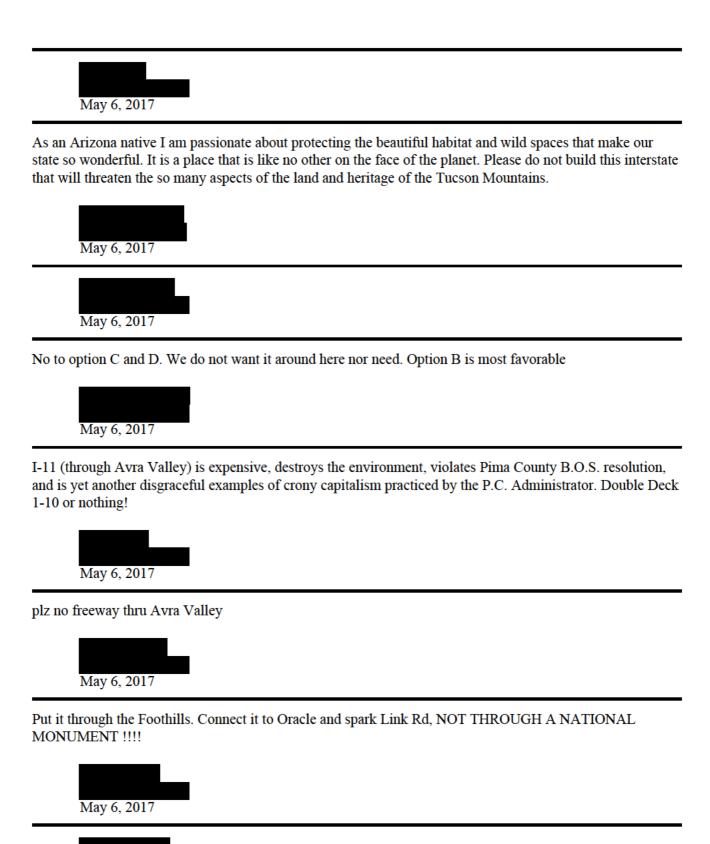
May 6, 2017

This is a beautiful area. Please don't ruin it for both people and wildlife.









May 6, 2017

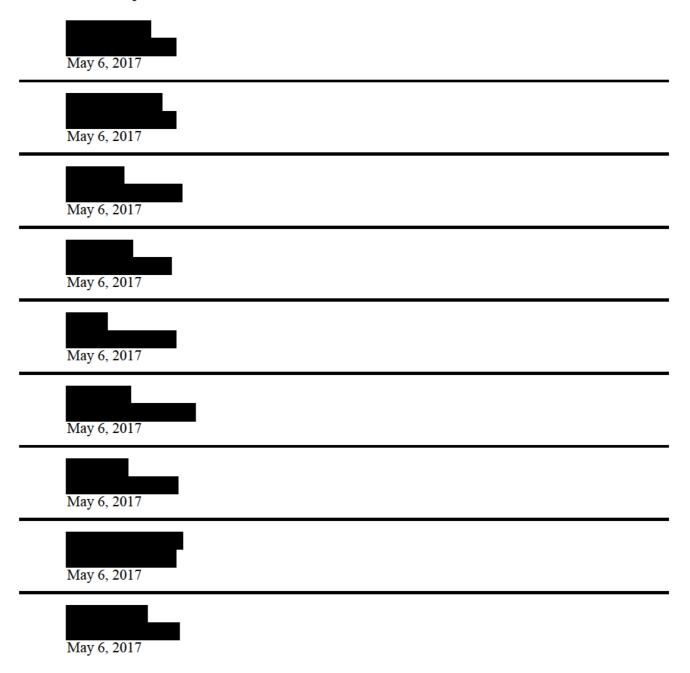
right through our home! We will not lose our home for this, along with anyone else in this area! We live out here to be away from the city. Do not bring this here! May 6, 2017 May 6, 2017 Option B is the only reasonable option! May 6, 2017 May 6, 2017 My daughter and son in law have just purchased a property in the area and they could possibly loose their home. May 6, 2017 May 6, 2017

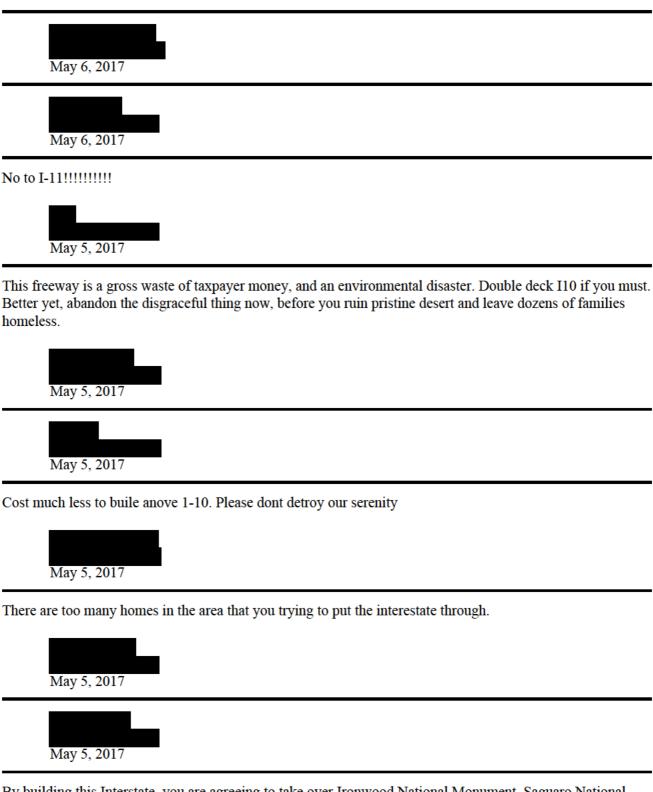
This is a horrble idea for this kind of highway to go through our valley! Looks like one of the options goes

My home appears to be in the way of the proposed freeway. I will either have a front row seat to Mexican trucks, or be homeless. Would rather not have either.

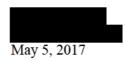


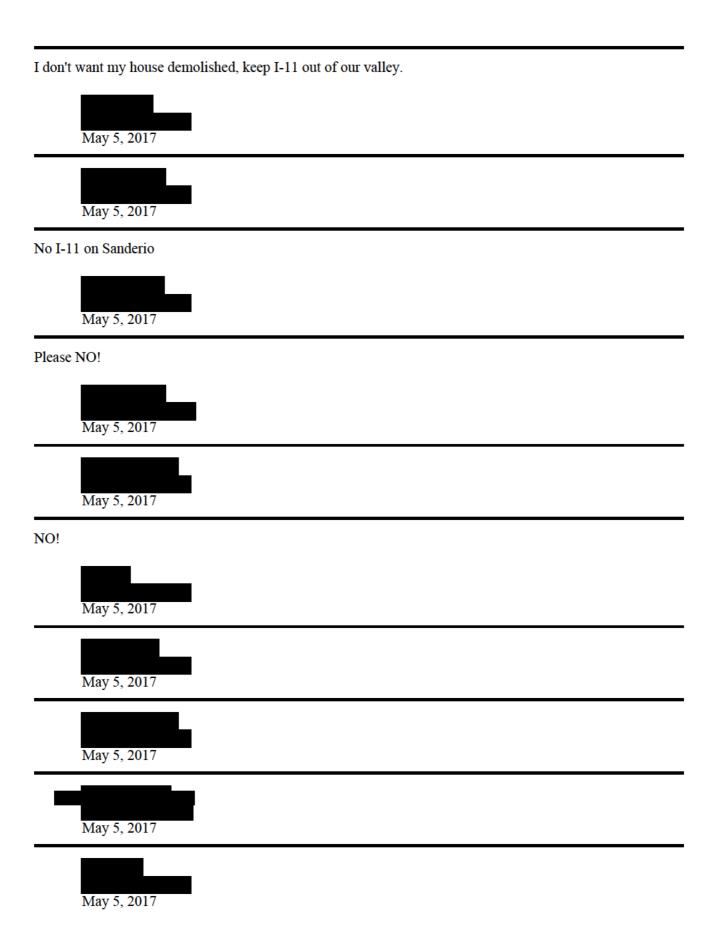
Both routes going through Avra Valley are completely unacceptable, as the area has a long-standing history of protecting the cultural and natural heritage that characterize the valley west of the Tucson Mountains. We will not stand for this, especially considering the I10/I19 corridor already exists, will boost the economy of Tucson proper, and will not completely fragment the protected lands in Avra Valley. We will not back down, and ADOT will not keep this under the radar.

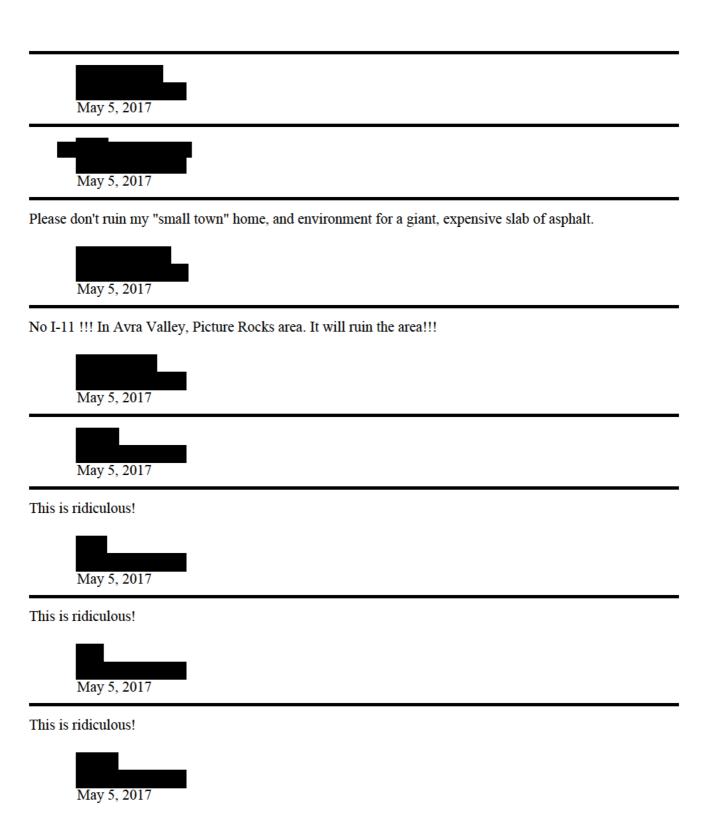




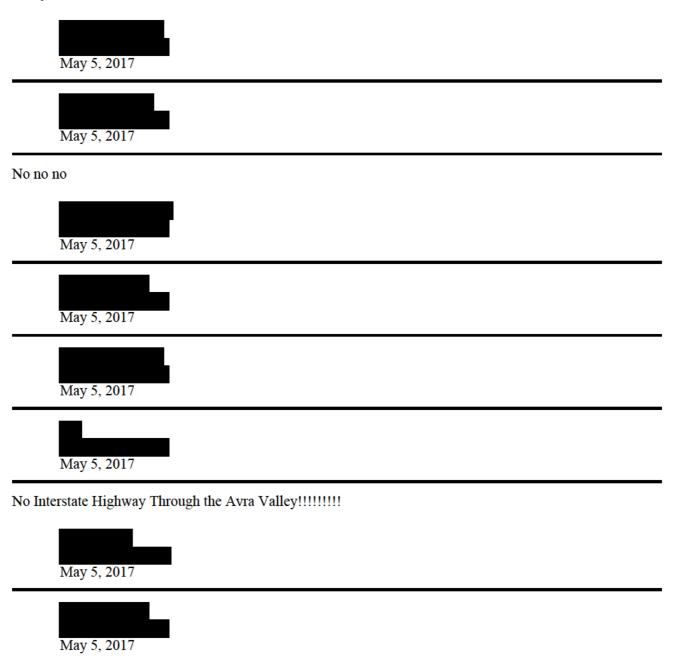
By building this Interstate, you are agreeing to take over Ironwood National Monument, Saguaro National Park, tribal lands AND MY HOMETOWN!



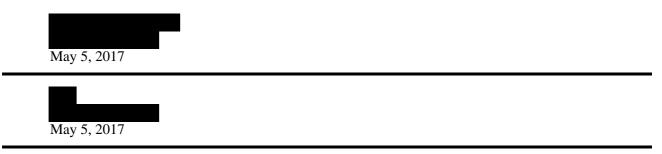




Please do not destroy our beautiful valley and take our homes away from us! First we get the regional dump and take in out of State garbage, then the Monsanto Greenhouse which puts toxins into our environment and our bodies and now you are trying to build a freeway as well?! I have no doubt that political and financial interest are the driving factors here and we, the people in Avra Valley have nothing to say but I urge you to consider the lives of the people you will be displacing! We work paycheck to paycheck to paycheck for our homes and work very hard to maintain what we have! We raised our families here and cherish our beautiful valley! Please do not destroy our homes and lives! Build out I 10 to 4 lanes each way but do not take our valley!



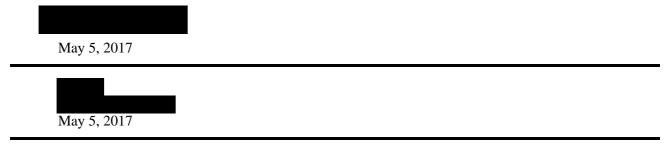
I morally oppose either option to put I 11 through the Avra Valley. Doing so would forever negatively alter what makes this area so special to its humanity and wildlife. There is no reason to build through the Avra Valley, causing irreversible light and noise pollution, inevitable highway sprawl, and the suffering and death of wildlife along the Tohono O'oadam tribal lands, Saguaro National Park, Ironwood National Forest, and countless rural residents like myself who chose to make a life here, far from the the city and its highways. These routes would also be more expensive to taxpayers than the options of "no build" or "double-decking" I-10, and likely invite increased crime and illegal trafficking to our Avra Valley communities. Please take the correct moral action and do not allow I 11 to be placed through Avra Valley.



Look at google earth and measure the distance of existing north-south highways in the western United States. Do you see any that are placed so close together? Of course not - it makes no sense. If you build a new highway so close to an existing route, Arizona will be the next laughing stock of government waste: the new face of the "bridge to nowhere."



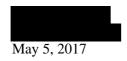
Huckleberry does not have any consideration for the impact of this highway. Listen to the people

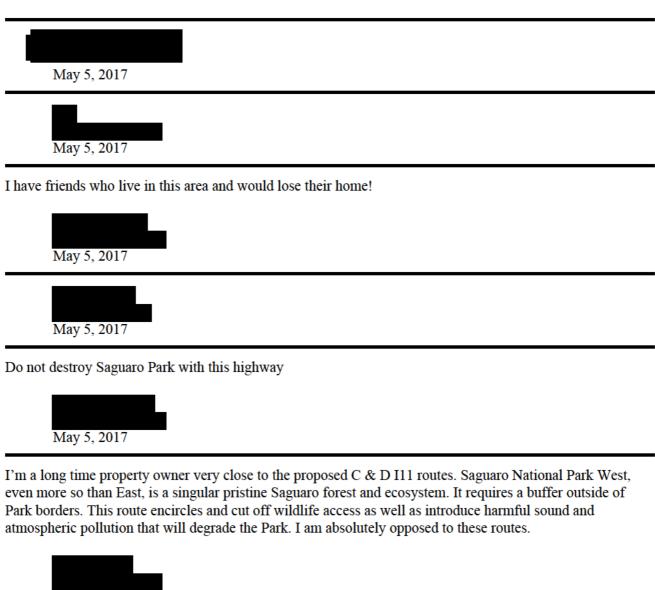


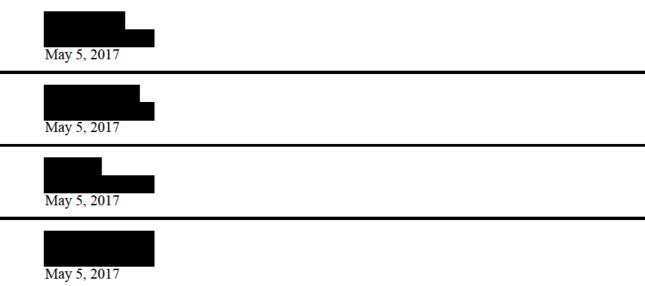
Not a good idea for a lot of reasons.



double deck the i-10 - its cheaper- don't kill wildlife, national parks and people living in the country because you want more money

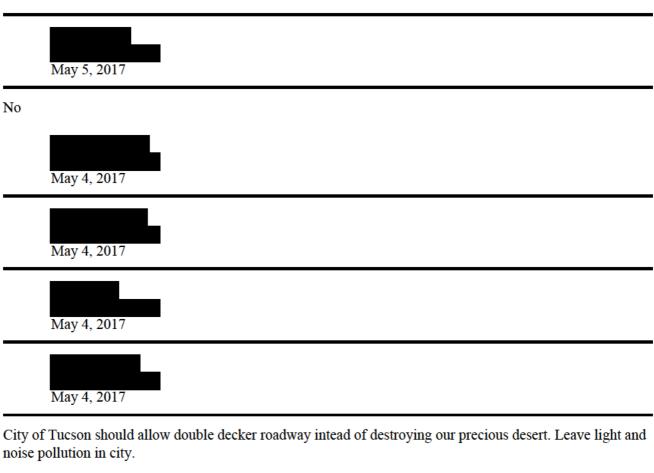


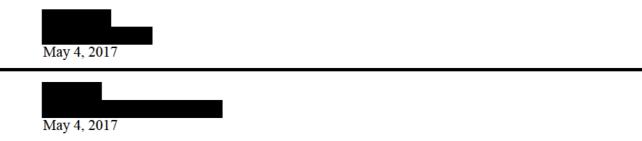




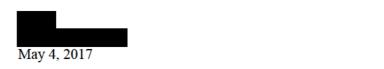
There is no need for another highway. The land that is planned to used has historical and ecological history and should not be touched. May 5, 2017 Stack it on I-10 May 5, 2017 May 5, 2017 May 5, 2017 please don't destroy the beautiful area around Tuson! terrible Idea, only reason to visit Tucn is it's natural beauty,do not blow it. May 5, 2017 May 5, 2017 May 5, 2017 Definitely against a new interstate west of Saguaro National Park. The brown haze north of Avra Valley, on I-10 is more than enough already! May 5, 2017 No Interstate 11 Highway Through the Avra Valley!

May 5, 2017



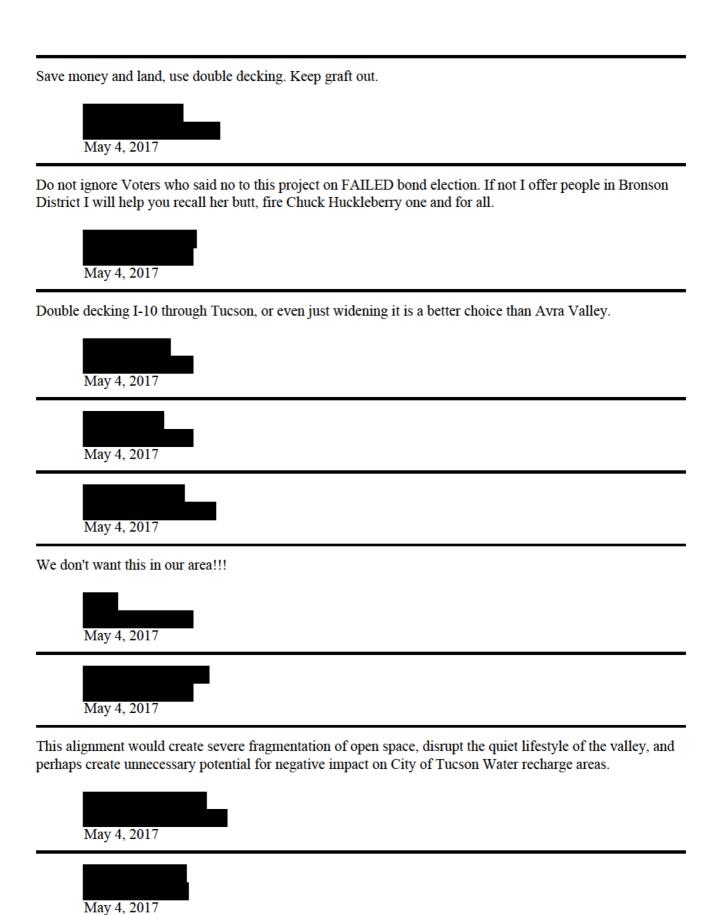


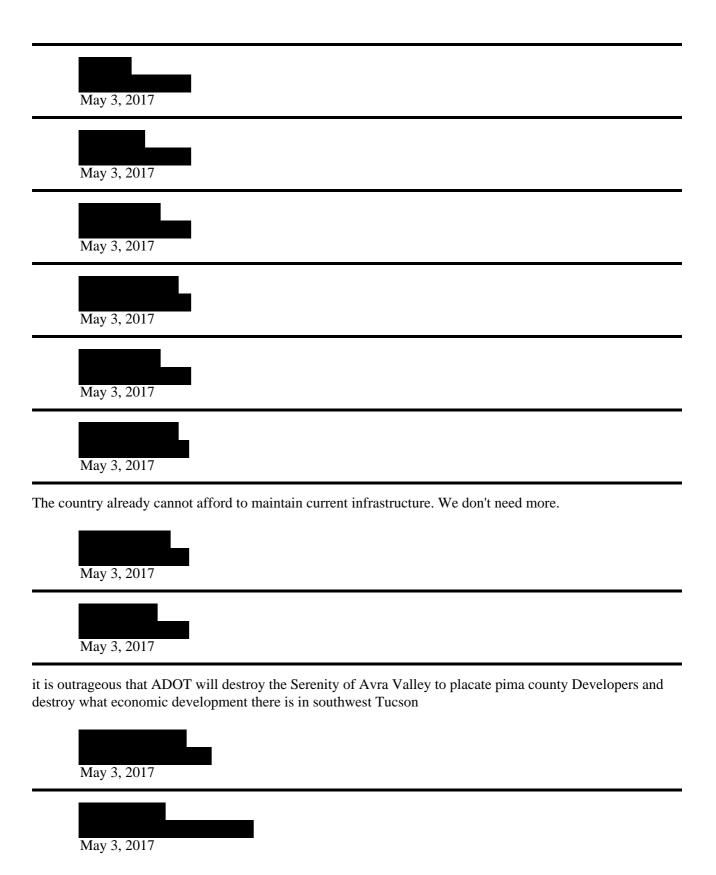
There is absolutely no need for this other than to line specific people's pockets. Improve what we have, stop wasting money on projects we do not need!



This would a detriment to the rural peaceful area that we all live in and a horrific environmental effect on the area as well. not to mention, the increase in traffic going over the pass and through the monument (Picture Rocks road). TAKE YOUR FREEWAY through your backyard, not ours

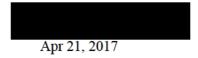




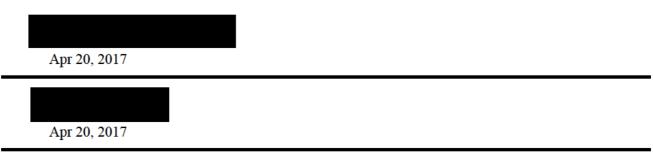


Running the corridor along the existing I 10 is a far superior alternative to destroying our irreplaceable natural wonders. May 3, 2017 May 3, 2017 The proposed route through Avra Valley is not needed, and it would negatively impact the Ironwood Forest National Monument, Saguaro National Park West, the Sonoran Desert Museum, etc, which are sources of ecotourism for the Tucson area. May 3, 2017 May 3, 2017 May 3, 2017 May 3, 2017 Apr 29, 2017 We need to slow urban sprawl and this highway would speed it up. It would cause further habitat fragmentation, which is already a very big problem. Please use the existing I10 route. Apr 28, 2017 Apr 28, 2017

We recently moved from Idaho and just found out they are proposing a huge interstate right outside our front door. We are absolutely against it and support double decking I 10.



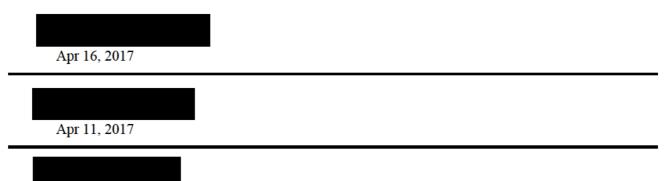
No! Are you people crazy or what! Leave our sensitive natural habitat alone. The plants and wild animals that make this area depend on every scrap of land; albeit the little bit they have left, to survive!



This will line the pockets of a few while sacrificing the environment and quality of life. Use I 10



Any lasting benefits of a transportation bypass through Avra Valley will pass right by Tucson, destroying our greatest natural treasures in the process. This shortsighted boundoggle is an egregious mistake.



Apr 11, 2017

This is a redundant freeway. It parallels I-10. It will also kill more natural desert areas and displace more wildlife. It will also change a rural area to a noisy polluted thoroughfare. It will steal people's right for quiet and peaceful existence. It is not a good idea. It is just a money maker for greedy people. Use this money to repair and improve I-10 and make that a safer freeway for all traffic. I-10 is such a dangerous road to travel between Marana and Phoenix. FIX I-10 rather than tearing up more virgin desert!!!

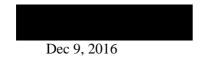


This our home there is plenty of city of Tucson land. Dont need to take our homes

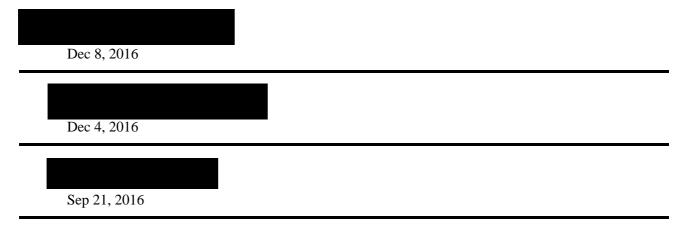


Mar 1, 2017

As a resident that will be directly affected by I-11 in Avra Valley, I strongly object to the environmental impact, plus the noise and congestion. I propose I-11 be constructed as part of the I-10 alternative.

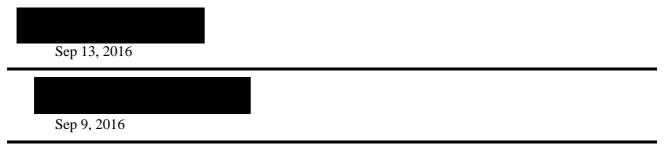


We don't agree with a freeway through picture Rocks, Avra Valley & Iorn Wood it would destroy our monuments and natural wildlife. Me and my wife have lived out here for over 25 years and have really loved the view and beauty along with the piece and quite that it provides, a freeway would ruin it not just for the community at large but for nature at its best!

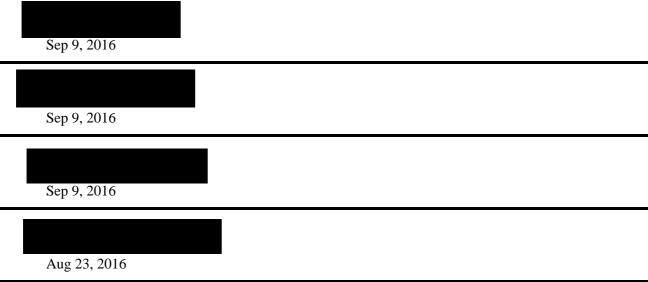


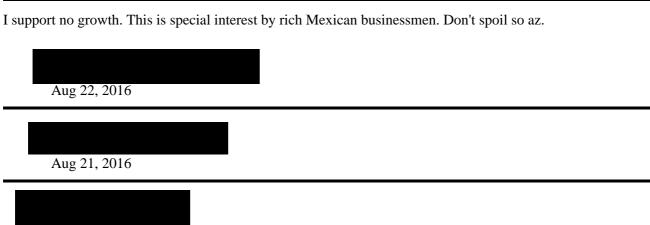
This unnecesary bypass would ruin pristine desert, ruin tourism and waste valuable taxpayer dollars. Oppose!

There is absolutely no need for this highway and would spoil our pristine sonoran desert - the views from the Sonoran Desert museum, from the Tucson Mountains etc would all be of a highway. And for what purpose?



Really folks, look at Warren Buffet, with computer logistics and planning all is better with trains. He just bought half of them! Let's watch large truck transport start to dwindle and the need for highways diminish and not start new highways. Thanks, Mark Miller.





I oppose this any I-11 bypass. Please consider the value of our desert for future generations. Aug 3, 2016 There is so much endangered wildlife that use the conservation area to migrate. Building the I-11 would create chaos for those animals, no one can predict how many would be lost due to the obstruction of I-11 in Avra Valley. Isn't it illegal to kill endanger species, that is what you would be doing with I-11. Aug 3, 2016 Aug 1, 2016 I feel there will be potential for negative impact on City of Tucson Water recharge areas. Aug 1, 2016 Aug 1, 2016 Aug 1, 2016 This is too expensive and benefits the cronies of the county. None of this is for the good of the majority! Aug 1, 2016 Aug 1, 2016 Aug 1, 2016

Waste of money.	
Aug 1, 2016	
This is not needed, Now or in the future	
Aug 1, 2016	
Jul 29, 2016	
Jul 29, 2010	
Jul 19, 2016	
Please do not build the road, it is such a beautiful area!	
Jul 18, 2016	
Jul 18, 2016	
Jul 18, 2016	
Jul 17, 2016	
Jul 17, 2016	
Jul 17, 2016	

It will ruin the land and upset the living animals at Arizona-Sonora Desert Museum.

Jul 17, 2016

Jul 17, 2016

Double decking the existing highway is preferable to building a new highway through a quiet, rural area.

Jul 17, 2016

Jul 17, 2016

No highway in our open land



Jul 16, 2016

wrong idea, wrong area...we shall oppose

Jul 16, 2016

Jul 16, 2016

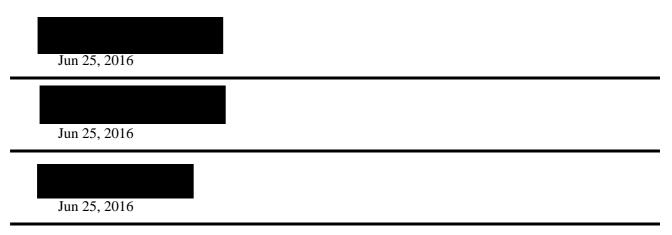
Jul 16, 2016

No freeway in Avra Valley

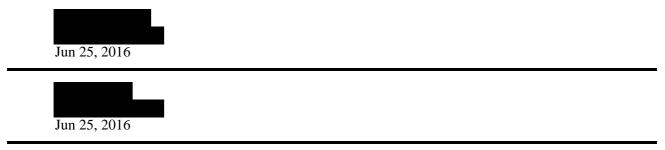


No! No!
Jul 5, 2016
I oppose the I-11 highway bypass because the negative environmental, historic, archaeological, and urban sprawl impacts.
Jun 30, 2016
Jun 30, 2016
There is NO PURPOSE and NO MONEY for a new corridor. Improve the I-8, I-10 and I-19 flow, or utilize the existing rail system.
Jun 29, 2016
Jun 28, 2016
Jun 27, 2016
Jun 27, 2016
How will this affect run off waters during the monsoons? Will we have more flooding in our residential areas?
Jun 26, 2016

There is no reason for this interstate. Build a second level on I-10. All the land has already been bought and cists less



Keep tucson beautiful! We do not need a highway bypass! What a waste of money. If we need any type of bypass/ highway it should be on the east side of town. But I guess all Huckleberry's rich cronies wouldn't want it in their backyard either!



Do not want an interstate in my backyard



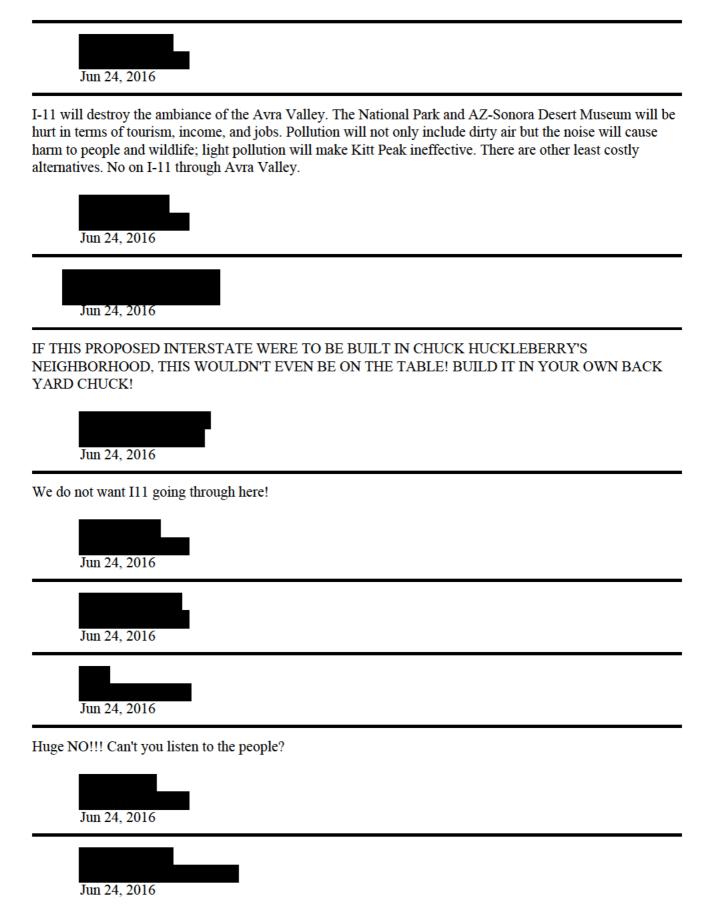
NO!

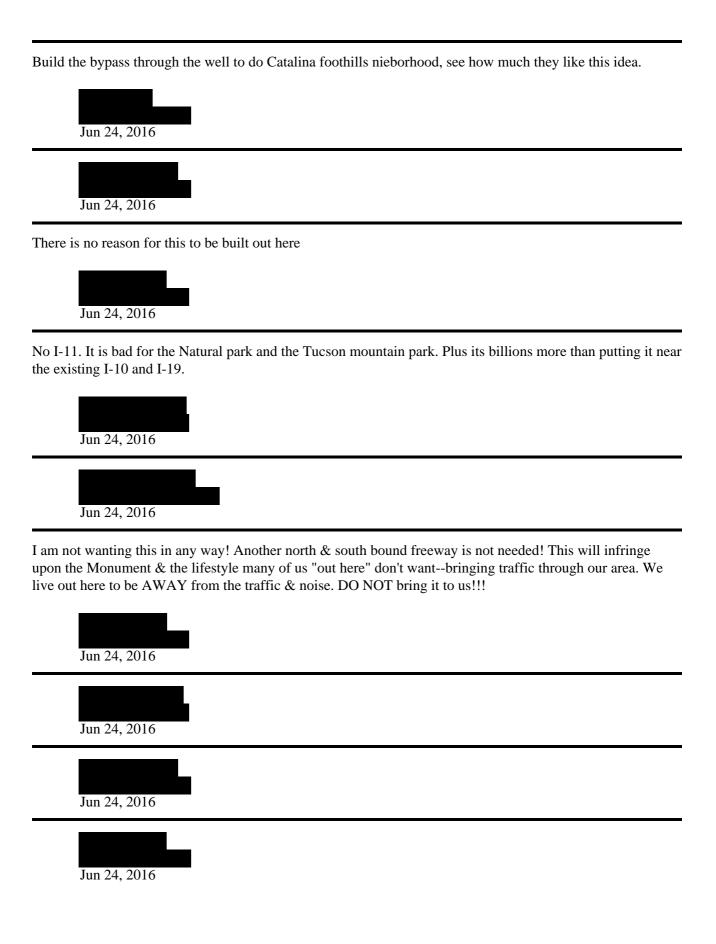


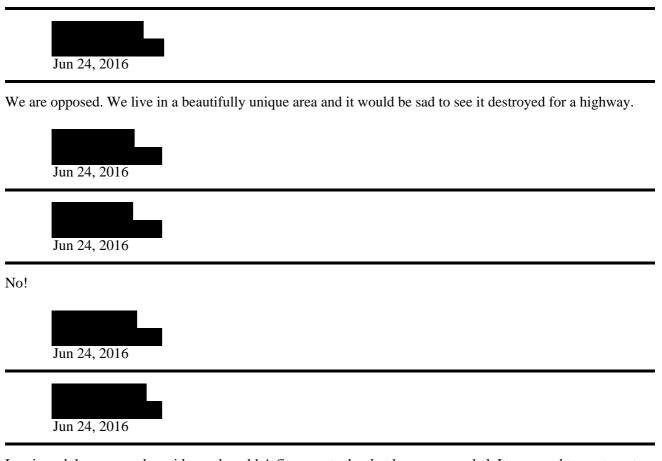
I-11 should never be put way out of the way in Avra Valley. This makes no sense and goes thru land that is set aside to preserve our irreplaceable desert land and to keep light and air pollution away from Kitt Peak.



No one is talking about how the light pollution from this will effect Kitt Peak, a valuable astronomic research facility. Jun 25, 2016 Jun 24, 2016 I live in the 85735 zip code and do not want the Interstate 11 Highway through Avra valley. Jun 24, 2016 Jun 24, 2016 Jun 24, 2016 No interstate through avra valley!!! Beautiful quiet desert. Don't ruin it! Jun 24, 2016 NO INTERSTATE THROUGH MY COMMUNITY. Jun 24, 2016 no new travel lanes- passenger rail instead. and shade it with solar- offset the power use of light rail and streecar throughout AZ. Jun 24, 2016 Jun 24, 2016



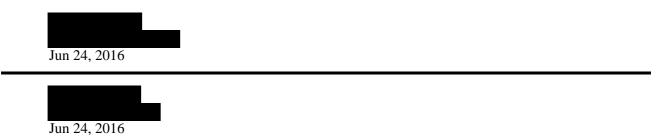




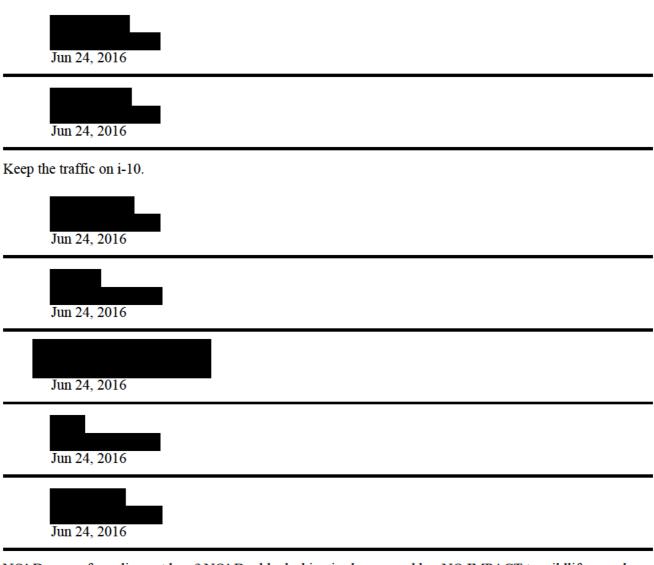
I reviewed the proposed corridor and couldn't figure out why that loop was needed. It appeared to me to cut up park land and invade wildlife corridors. It seemed to increase distance travelled for no good reason. If anything we need a better loop through the other side of Tucson.



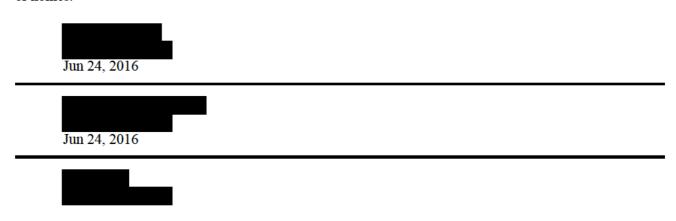
This is a bad idea, please consider double decking I 10.

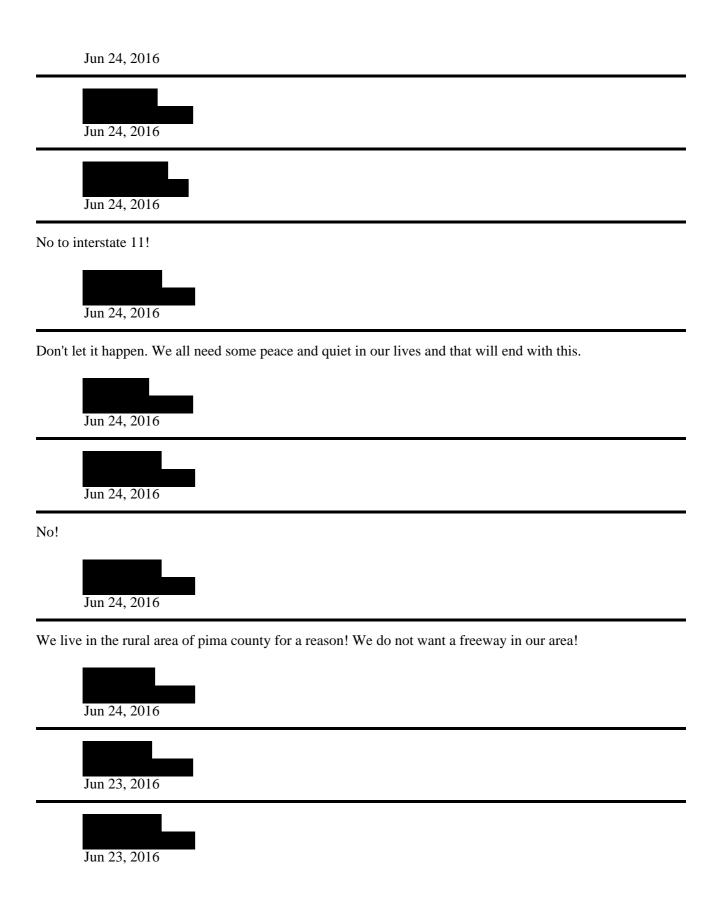


I love being able to raise my kids in a non busy area where they can play safely and we enjoy thr nature around us so peaceful and quite, no crazy traffic decent roads whats not to love! The valley is the best dont ruin it for the familys and the wildlife youve already destroyed it enough by putting dump sights out here!!! NO NO NO!!!!!!!

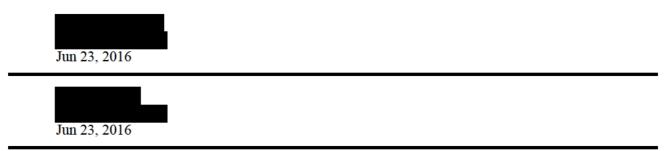


NO! Do any of you live out here? NO! Double decking is cheaper and has NO IMPACT to wildlife, peoples or homes.

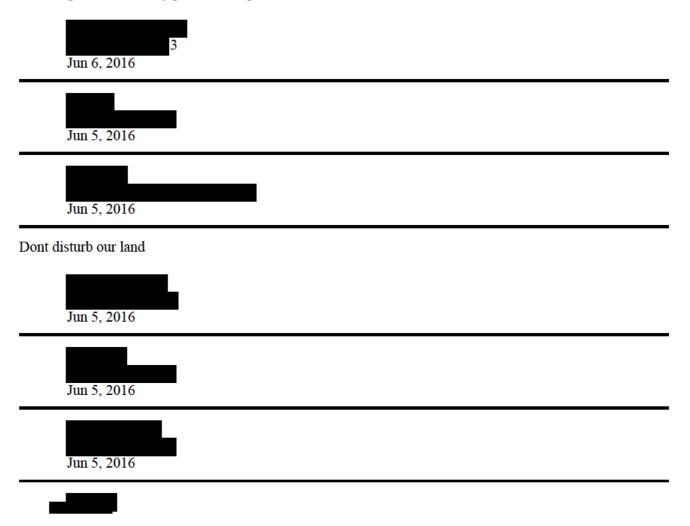


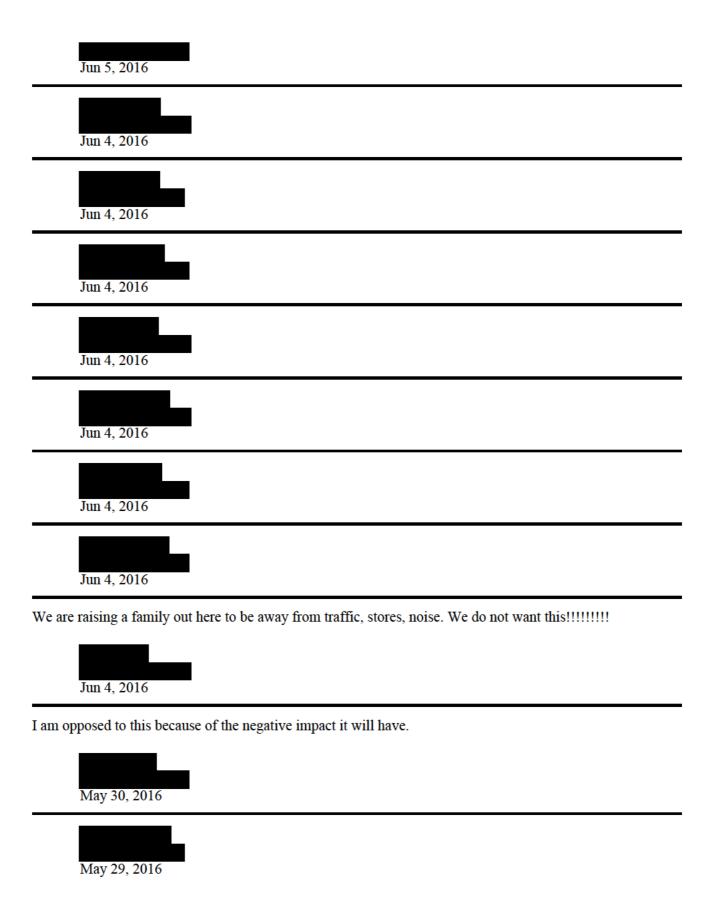


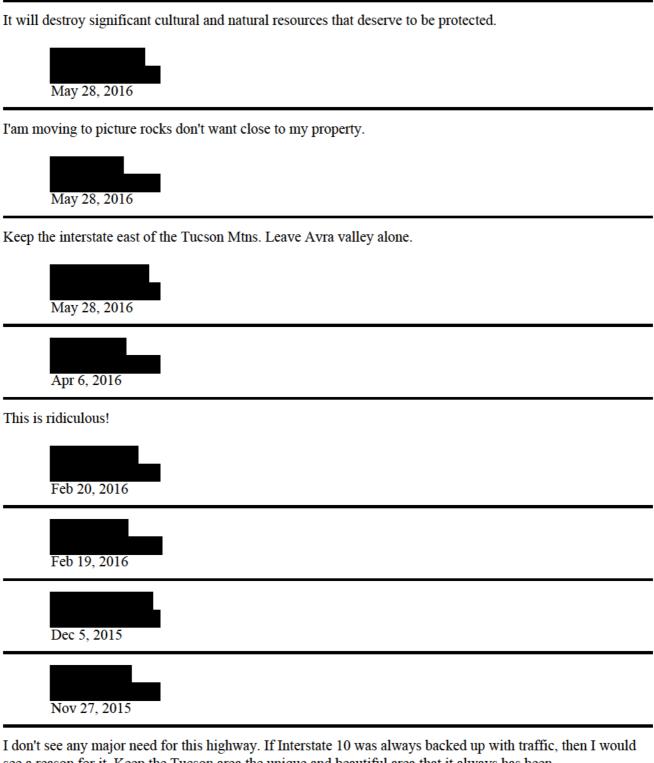
I am opposed to this because if I saw the plans right frim before my house is one of the 47 affected. If not being removed then we would be within a mile of the freeway. Crime rates would rise. We also would not get a view of the night sky lime we have always enjoyed. My family built this house in 1949 and I have no wish to see it destroyed for the sake of a freeway.



There has been talk for decades of closing or making Picture Rocks Rd a toll road due to the environmental impact on the Saguaros . So now you want to run a major freeway by the National Park? You can't even fix pot holes in Tucson or finish I-10. The effects of the air, light and noise pollution would be devastating on many things. Saguaro National Park, Iron Wood National Forest, Tucson Mountain Park, Desert Museum, Red Hills Info Center, Kitts Peak, wildlife mitigation, animals, plants, historic and archaeological items such as the petroglyphs etc found on Golden Gate Rd. Chuck Huckleberry and his cronies will make a lot of money at the expense of the only place on the planet like this.



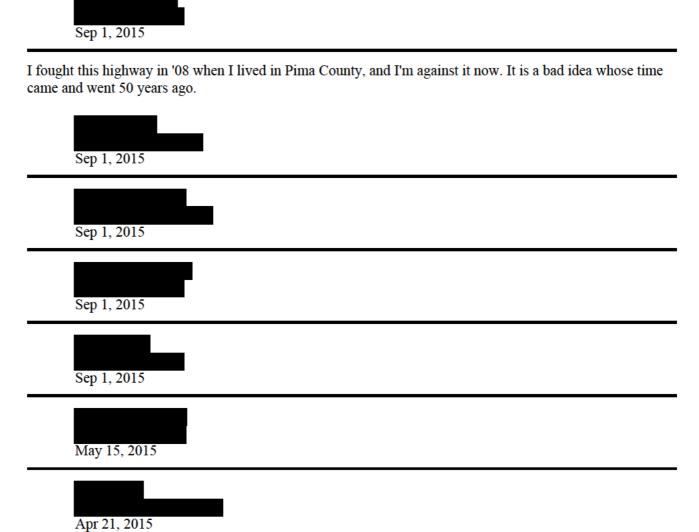




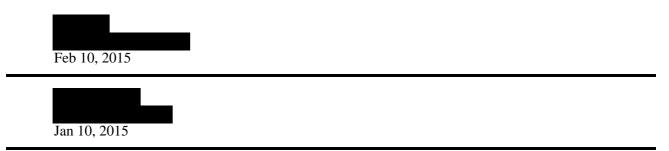
see a reason for it. Keep the Tucson area the unique and beautiful area that it always has been.



Keep the peace of this beautiful place Nov 16, 2015 Retain the natural areas, protect our neighborhood. No I-11 through our homes. Nov 15, 2015 I oppose any interstate highway through Avra Valley Oct 29, 2015 This is a bad idea all around and I oppose the bypass. Oct 29, 2015 Oct 28, 2015 Please do not ruin my backyard! Wildlife, air sounds of nature. Oct 28, 2015 I strongly oppose this idea! Oct 14, 2015 Sep 2, 2015 Sep 1, 2015



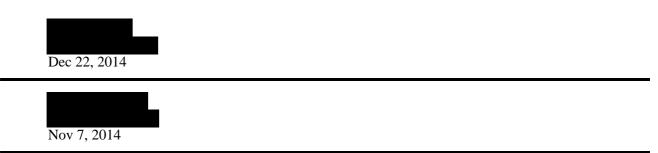
The proposed I-11 highway corridor proposed to run along Sandario Rd and thru Saguaro National Park West is a loosing prospect and idea on so many levels, first economically, then biologically and lastly the urbanization of our few remaining rural communities namely Pictute Rocks. As a fiscal conservative, the highway makes little financial sense in that the infrastructure is already in place to handle the existing demand and any forward looking person can see the finite relationship the US has with its goods trading partners and. NAFTA in both Canada and Mexico. The costs way outweigh the benefits. As a biologist, bisecting the wildlife corridor literally thru the middle of ANY National park is a free ticket to the perpetual listing of species both on and off the Endangered Species Act list. Lastly, the citizens of Picture Rocks have actively sought a way of life outside the city of Tucson for every reason and this proposal is a completely disregard for not only our current quality of life but for future tourism and real estate development opportunities as changing this face of rural life negates that market for all of west Tucson. Think again. We will be watching and fighting with science, economics and the power of the people.



The appears to be no need for a need for an alternative route from Nogales to casa Grande. This section of proposed Interstate 11 is a money waste and a pork-barrel " make work' project at best. Multiple ADOT studies show that traffic congestion on I10 through Tucson is in a very limitedlocal phenomenon and only a peak commute times. Building a bypass route when transportation companies can easily avoid congestion on I 10 with scheduling and transport times is am enormous economic and environmental mistake.

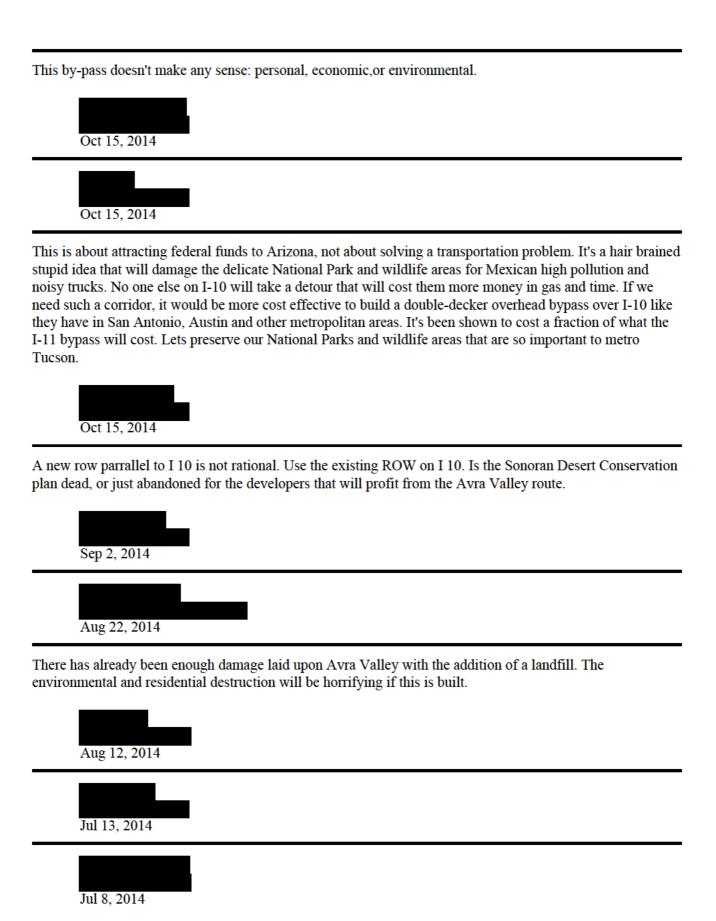


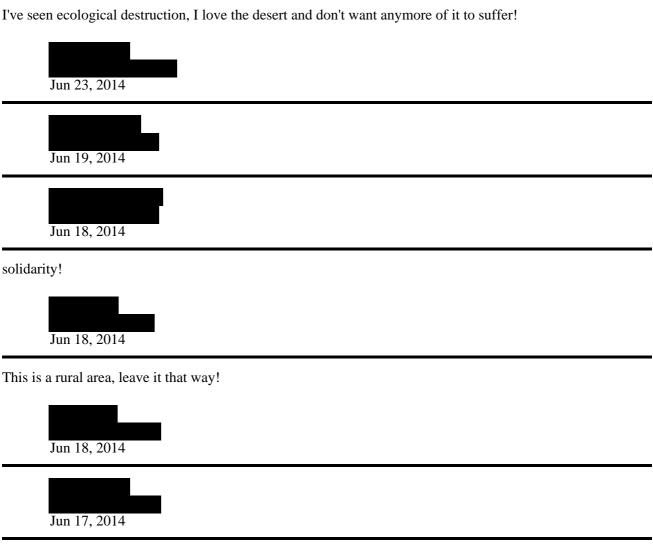
A waste of taxpayer money. Use the newly upgraded section of I-10 through Tucson.



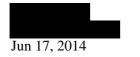
This freeway would be horrible for wildlife, for the Desert Museum and the National Park and for the residents of the Avra Valley.







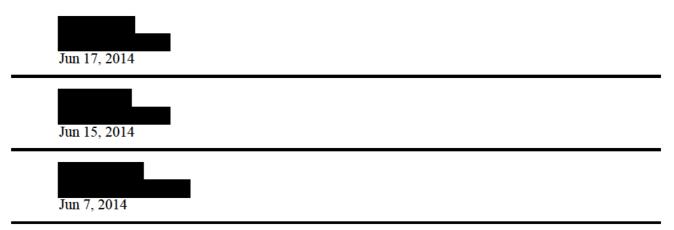
Im born and raised in the area where this nonsense would be bouldering through and would hate to see my beautiful desert mowed over for an eyesore such as a highway that would bring more pollution a destruction to such a beautiful part of the world. Sauguro National Park and all the wildlife would be disturbed and greatly hurt do to this terrible idea. There are already highways to connect these bigger citys please dont destroy towns and beautiful scenery and plant life only native to this region of the world to safe yourselfs few minutes of transporting. Because in comparison for anyone for this highway it is just minutes as you may look at it as just a highway going threw small little towns. This been home to all of us for years that live here and wouldnt want to be anywhere eles. For what it will cost moneywise verses what it'll destory is just not worth it.



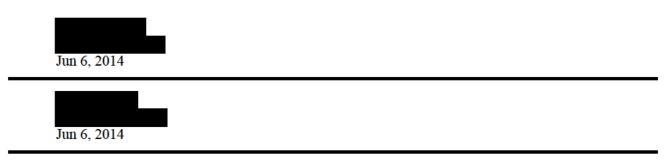
Horrible idea! Do not do it!!



We move out to the country to have peace and quiet. Don't take this away from us. We do not want a freeway going through here. There is nothing wrong with the roads we have for travel. We have horses. We don't want to have to ride next to a heavily traveled freeway. No no no.



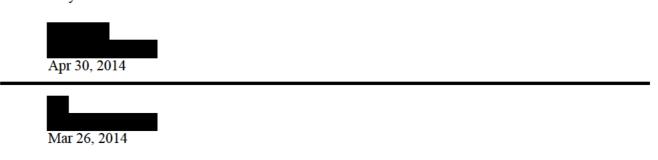
Avra Valley is a place where families find peaceful living with good neighbors. Saguaro, Tucson Mountain & Ironwood parks are national treasures that are irreplaceable. Building the I-11 bypass will damage the ecology of the parks, the Indian nation and all of us that appreciate the peace and beauty we enjoy in Avra Valley. I urge the board to reconsider Avra Valley as a route for this project.

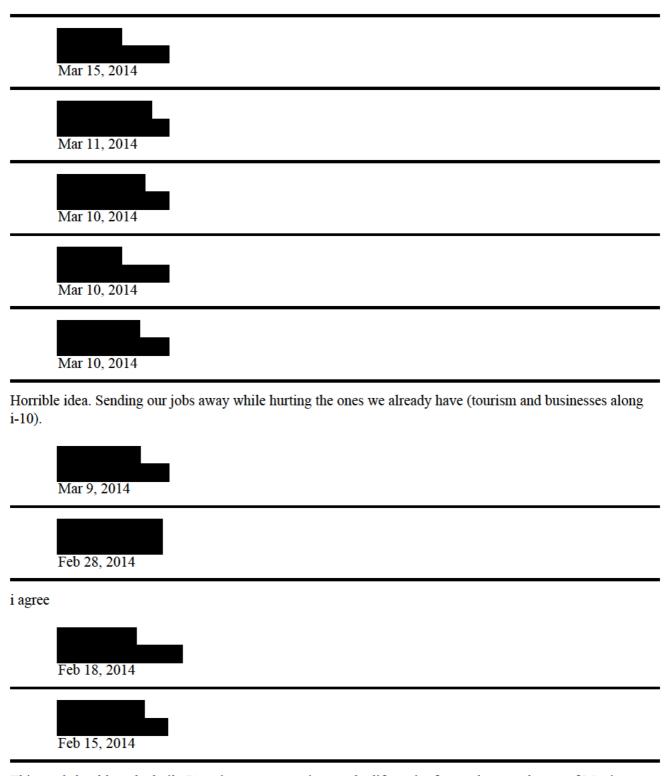


This I-11 bypass is not need and I vote against it!

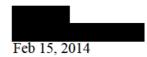


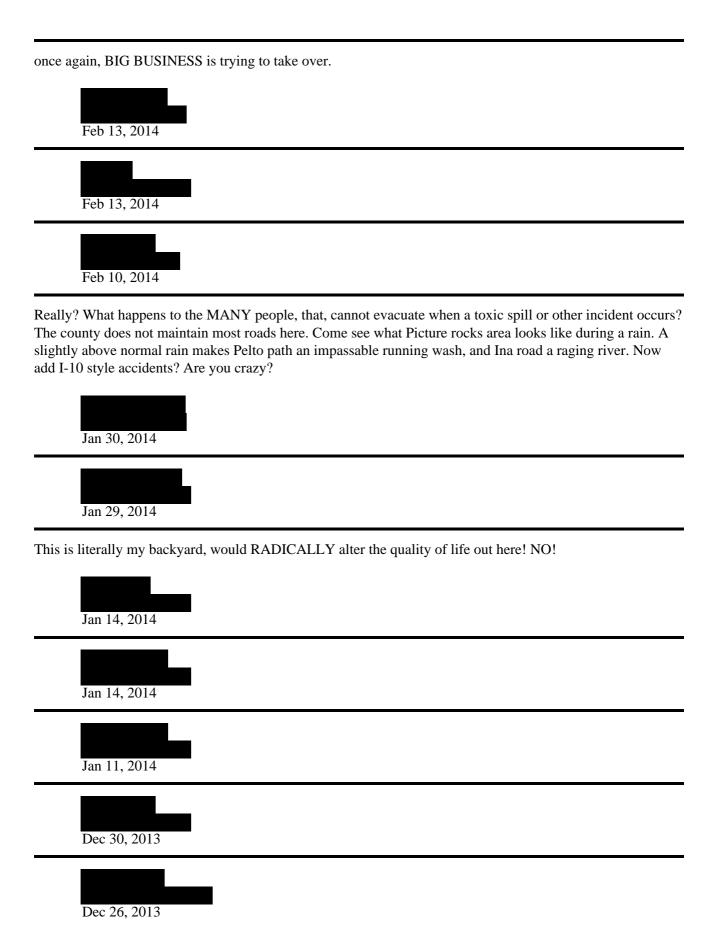
No Interstate through Avra Valley where the Saguaro National Park West, Ironwood Forest National Monument, Tohono O'Odham Nation, the Cats (bob, mountain) and Tortoise play and live. Not to mention us humans. We like our wildlife and quiet area, that is why we moved out there in the first place. To get away from the city and interstate noise.

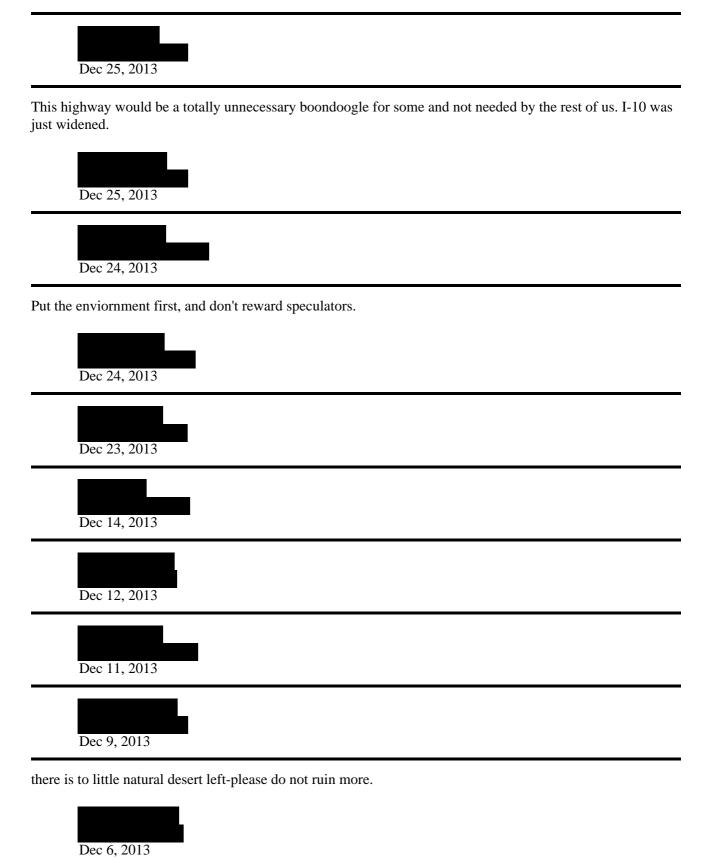


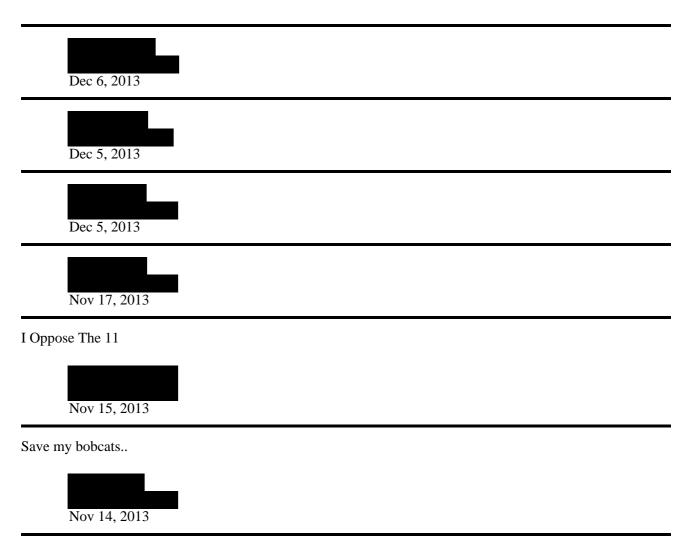


This road should not be built. It's primary purpose is to make life easier for produce trucks out of Mexico.





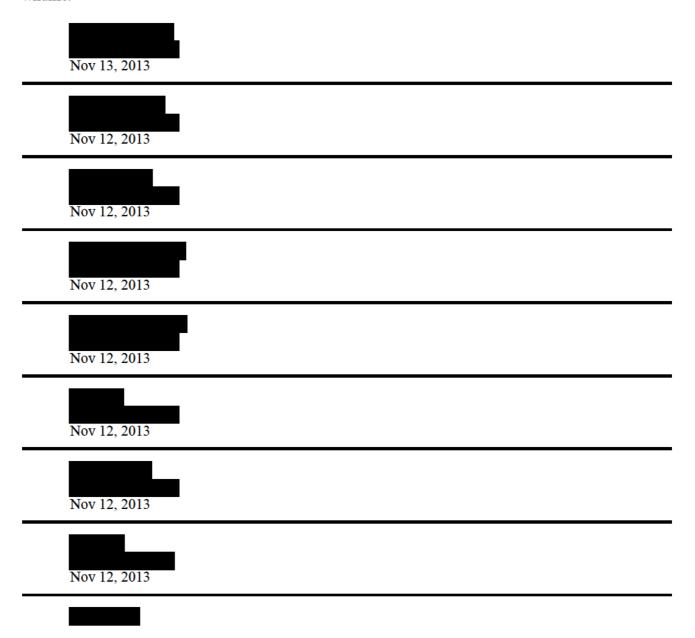


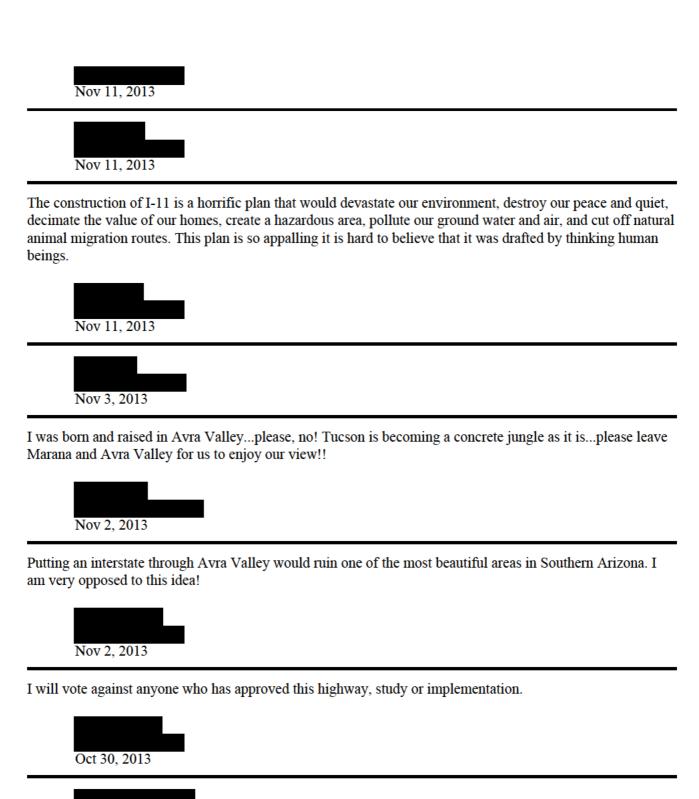


We have a quiet little valley which is why we chose to live here. The national park is across the street from us and the whole aesthetic flavor of this beautiful area would be changed. A highway brings polution (save our saguaros) noise, and commercial development we do not want nor deserve. The value of our house will go down. People who make these decisions do not have to have this monstrosity in their back yard and there has been no input from those who must endure it. There is a lack of democracy here.



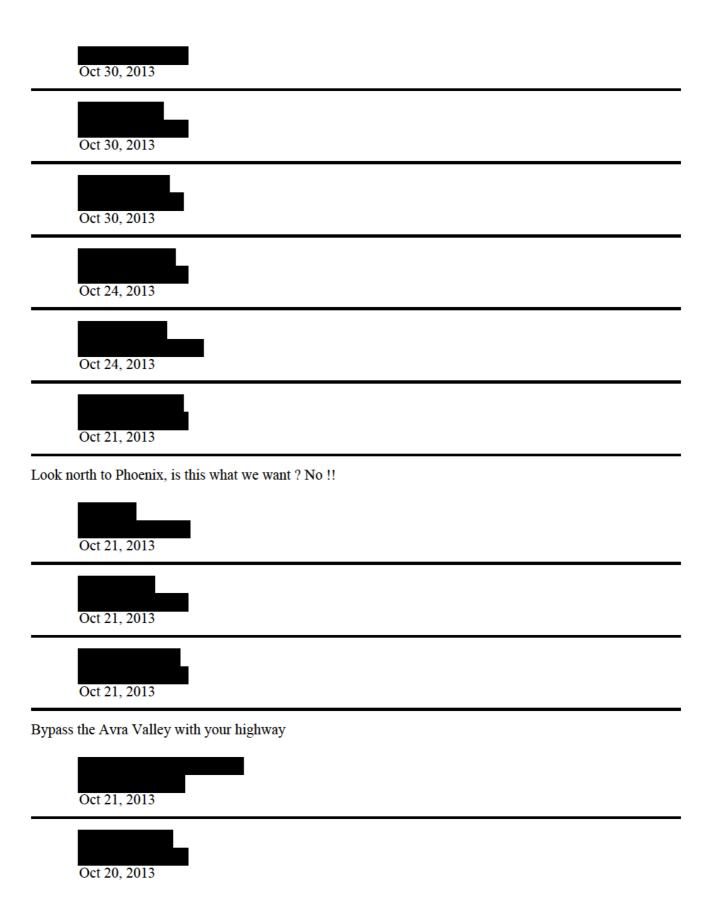
Here are some of the reasons why this route should be permanently deleted from consideration for this project. 1) Building I-11 in Avra Valley would bring about complete destruction of the homes and way of life for thousands of Avra Valley residents, ruining the peaceful beauty of this valley and turning it into a polluted, noisy and hazardous place. 2) Inadequate public right-of-way between the Bureau of Reclamation Tucson Mitigation Corridor and the Tohono O'Odham Nation 3) Negative impact on the inter-mountain wildlife corridor, and destruction of wildlife. 4) Negative impact to Saguaro National Park West 5) Negative impact on Tucson Mountain Park 6) Negative impact to the Pima County Conservation Lands System 7) The cost is TWO THIRDS higher to build this corridor in Avra Valley than it would be to take the route down the existing I-10 corridor. 8) Taking the route through Avra Valley would destroy existing jobs and businesses along the I-10 corridor, as truckers will be forced away from existing services along the I-10 corridor through Tucson. These people and businesses cannot simply relocate to Avra Valley! 9) The route through Avra Valley VIOLATES PIMA COUNTY POLICY as stated in the Supervisor's Resolution 2007-343. 10) Taking the route down the I-10 corridor would not require the destruction of homes, jobs, businesses, lives and wildlife.



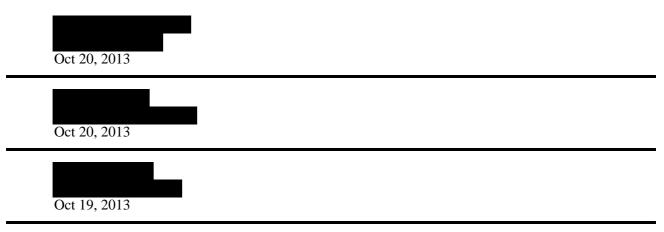


Oct 30, 2013

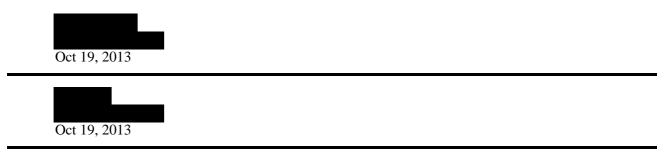
Oct 30, 2013



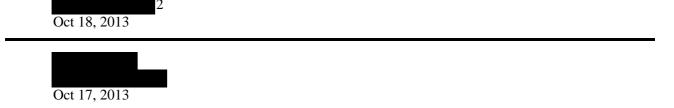
Please take an alternate route and keep Saguaro National Park and Tucson Mountain Park as they were intended - to preserve the desert plants and animals.



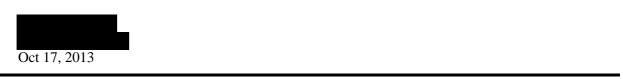
This would be a disaster for wildlife. The Tucson Mountains would become totally isolated. Saguaro National Park West and all it stands for would be in jeopardy. Is this the fate we want for our region?



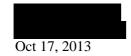
Please protect our beautiful city, Mr. Huckelberry. Thank you.

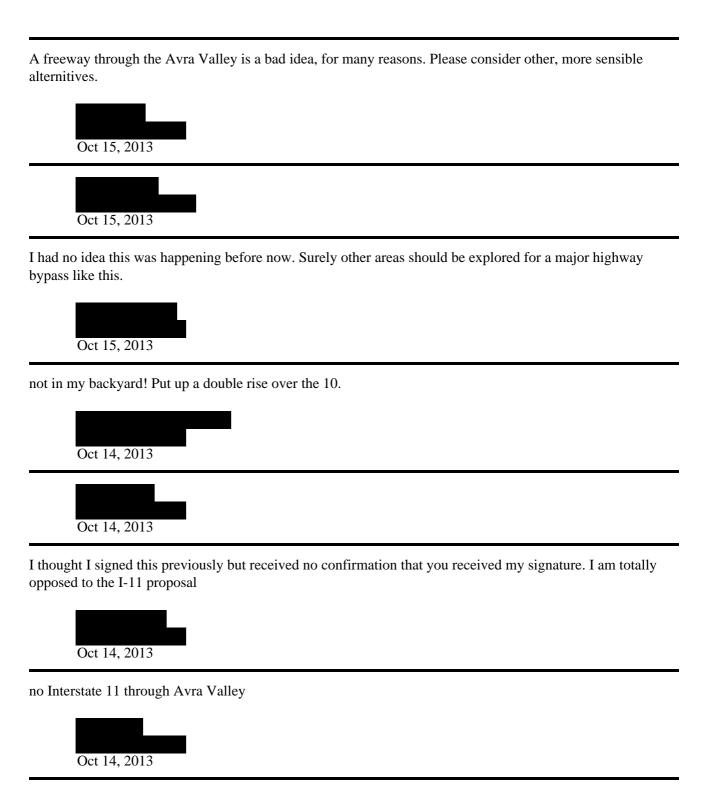


Bad idea!

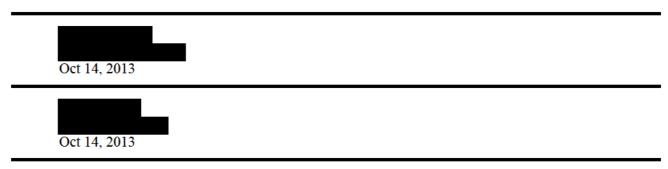


Stop the madness!! There are too few pristine desert areas left already.

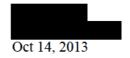




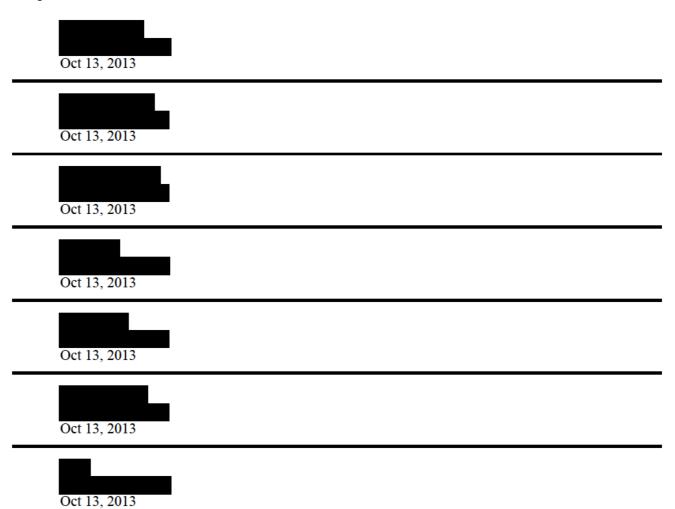
I grew up in Silver Bell and Avra Valley. An additional interstate through the Valley would cause irreparable damage to the fragile desert ecostructure there.



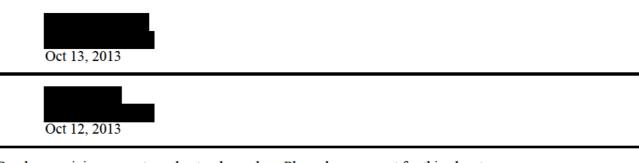
I am concerned about my neighborhood, including the wildlife I so thoroughly enjoy in the washes and trails that would be affected by this roadway. Please no highway in my backyard!



I strongly oppose the I-11 Highway through our beautiful valley. The animals you would be destroying not to mention vegetation is unacceptable. You can double deck I-10, there are feasible studies to show that it is an acceptable alternative!!!



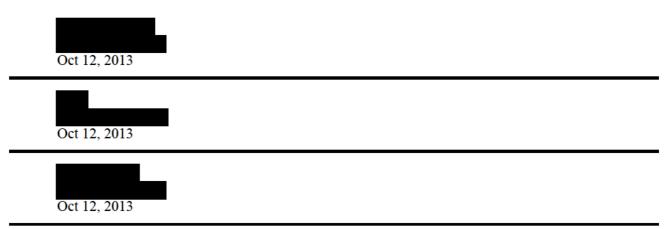
At a public meeting 5-6 years ago 3 by-passes were suggested and the consulting firm studying the feasibility of a by-pass stated that it would alleviate 1-15% of the traffic through Tucson. This is a bad idea that hopefully will not become reality.



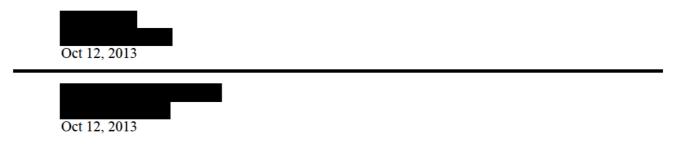
Roads are ruining our untamed natural wonders. Please have respect for this planet.

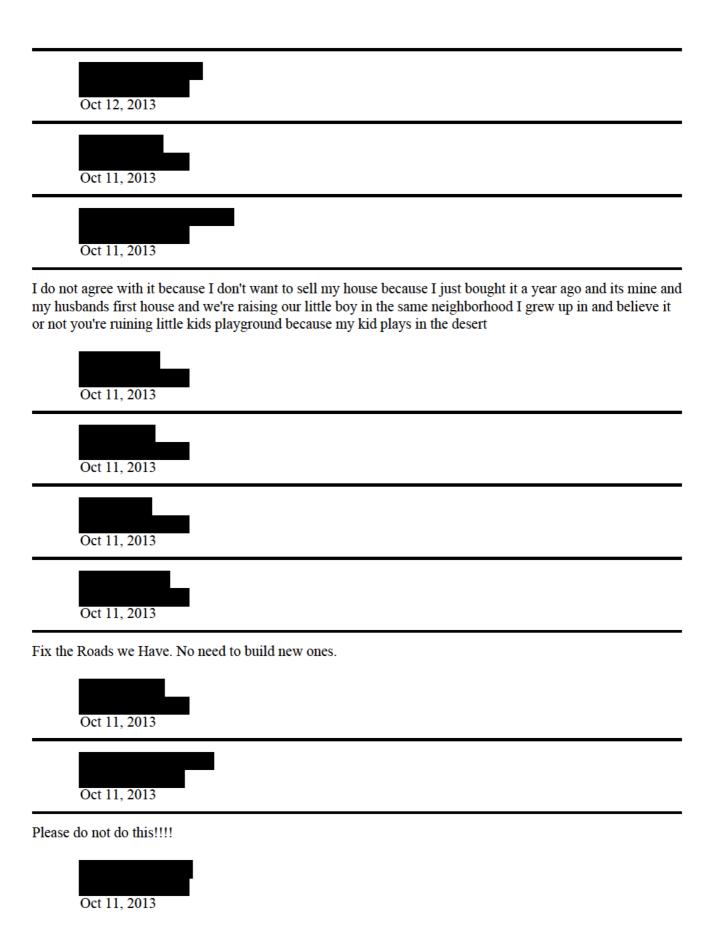


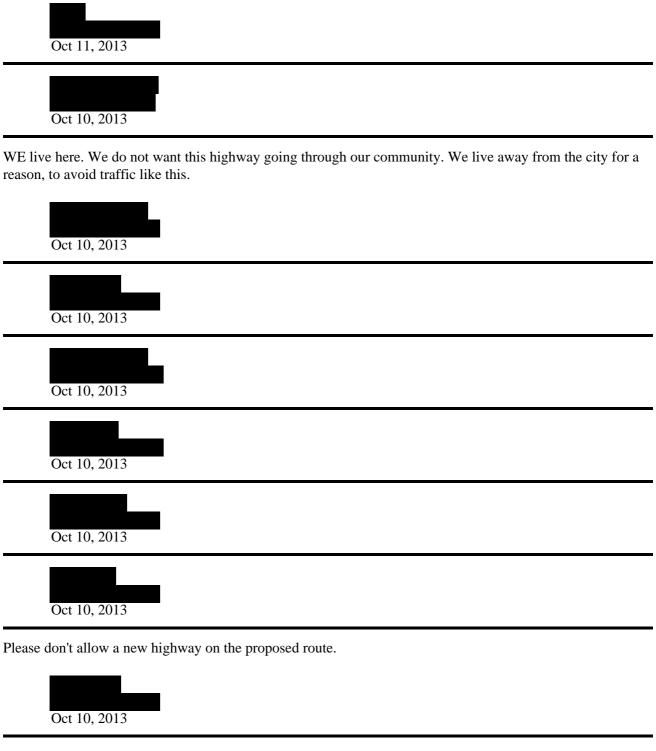
I live in Picture Rocks and I do not want an Interstate anywhere near my back yard that's why I moved out here !!



Leave the valley the way it is. We all live here because we like the desert and being away from major roadways.



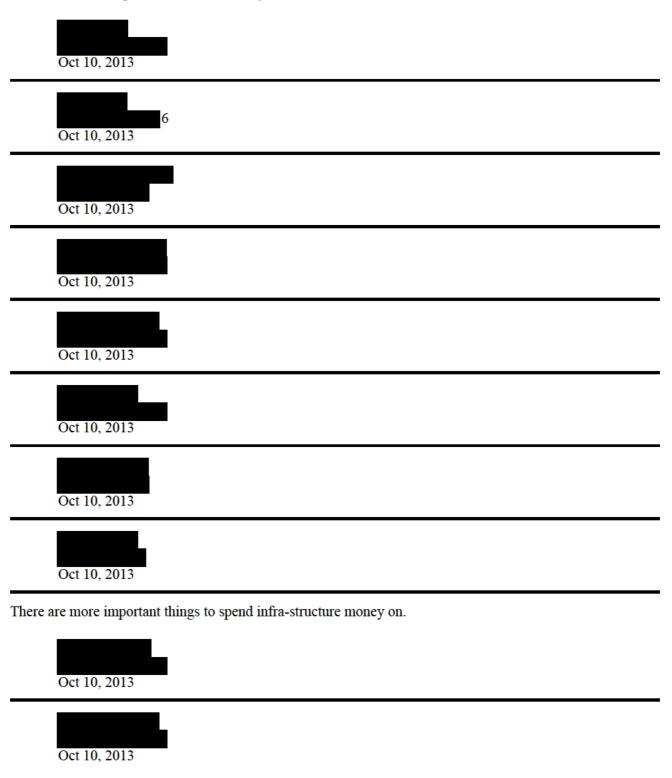




There are many things Pima County needs before this. I question the real reason behind this proposal.



Chuck Huckleberry should Not get his way against the people who live in Ava Valley. It makes more sense to build above existing road. A lot less money too.



I live in Avra Valley and moved here to avoid congestion and the city. An interstate through this beautiful valley would destroy it and cause untold damage to the area. Lets preserve our beautiful Sonoran Desert instead of paving it.



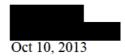
I have a multiple chemical sensitivity disability...this highway will harm my health. Please do not make this project a reality.



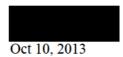
No I-11 through Avra Valley!! 💔



This highway will be disruptive and have no benefits to local residents. I do not support it.

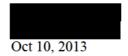


I oppose!

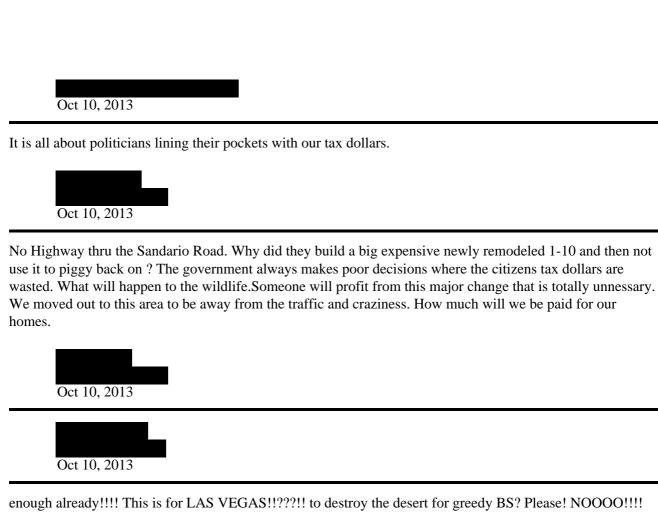




If I-11 bypasses Tucson, it will become a ghosttown. If you bring it through Avra Valley, wildlife will lose their homes and historical archaeological sites will be destroyed. Save the tax payers billions of dollars by attaching it to I-10! Leave Avra Valley alone!



Please don't destroy the natural beauty of the land. So much is gone now!

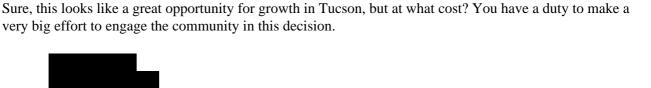


Oct 10, 2013

enough already!!!! This is for LAS VEGAS!!???!! to destroy the desert for greedy BS? Please! NOOOO!!!!

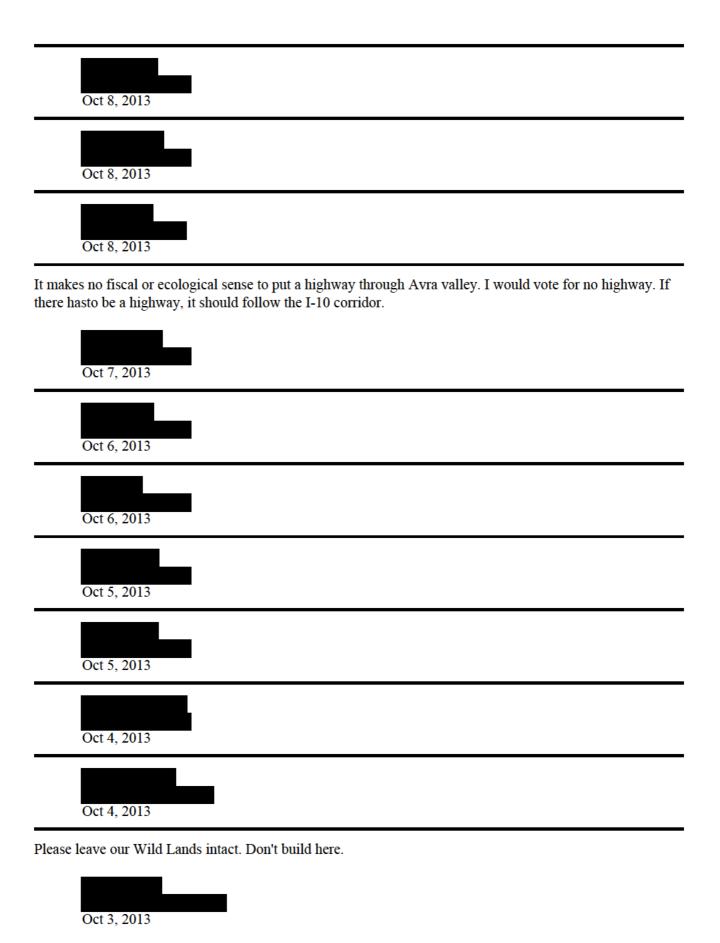
Oct 9, 2013

Oct 9, 2013



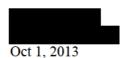
BAD IDEA

Oct 9, 2013

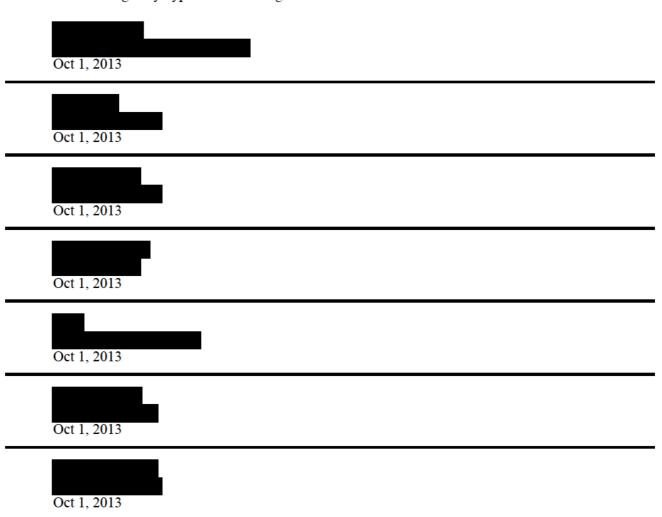


Tucson mountain Park. Wild life mitigation corridors and it is a low light area for Kitts Peak. Just to name a few reasons why NOT to put I 11 through. Avra Valley Oct 3, 2013 Oct 3, 2013 Oct 3, 2013 Look at the plan. No way is it sensible, except for developers who may have already invested in the area. Oct 3, 2013 Oct 2, 2013 48 Oct 2, 2013 I want to help top protect the native habitats in Arizona Oct 2, 2013 Oct 2, 2013 Highway boondoggles are so 20th century Oct 2, 2013

No I 11 in Avra Valley. There is the Saguaro National Park. Ironwood National Forest. Desert Museum.



This is an pristine, beautiful area of beauty that cannot be replicated. It is a favorite area of our travels. Please DO NOT allow a highway bypass to ruin this gift of nature.

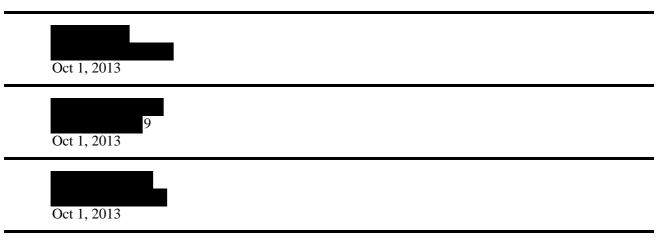


Double-deck what already goes through Tucson...no need to destroy a very beautiful desert.

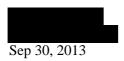


Let nature be

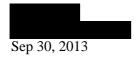




If the point of this highway is to funnel interstate business into Tucson, it needs to go into Tucson, not way out west of the mountains. It should follow the I-10 footprint. Putting it out here will encourage business to bypass Tucson.

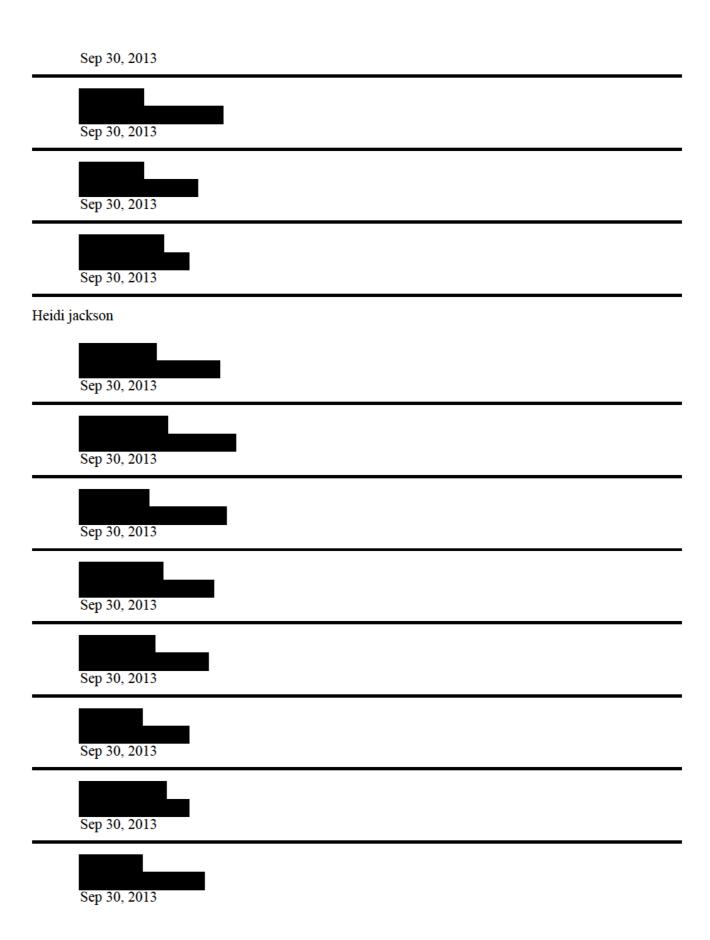


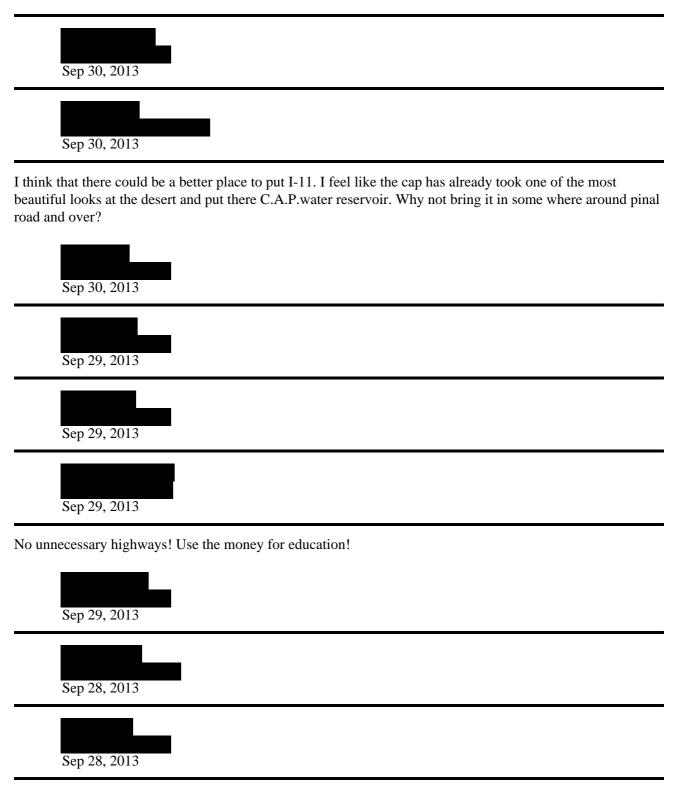
Time out. Let's declare a moratorium on such projects! We need to save our wild places for future generations.



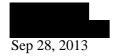
Please do not put this Freeway into this beautiful untouched desert. It will be polluted by noise and exhaust and people! Keep this place for our future children to visit and be taken by its beauty

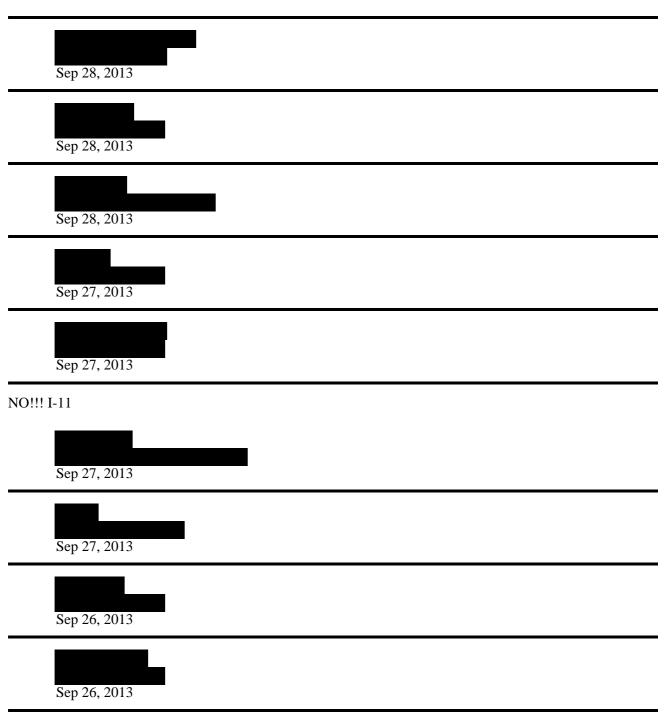




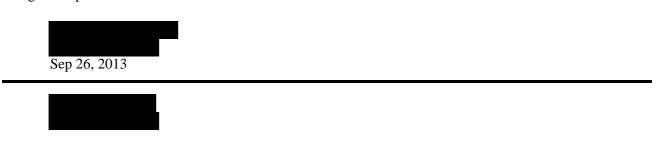


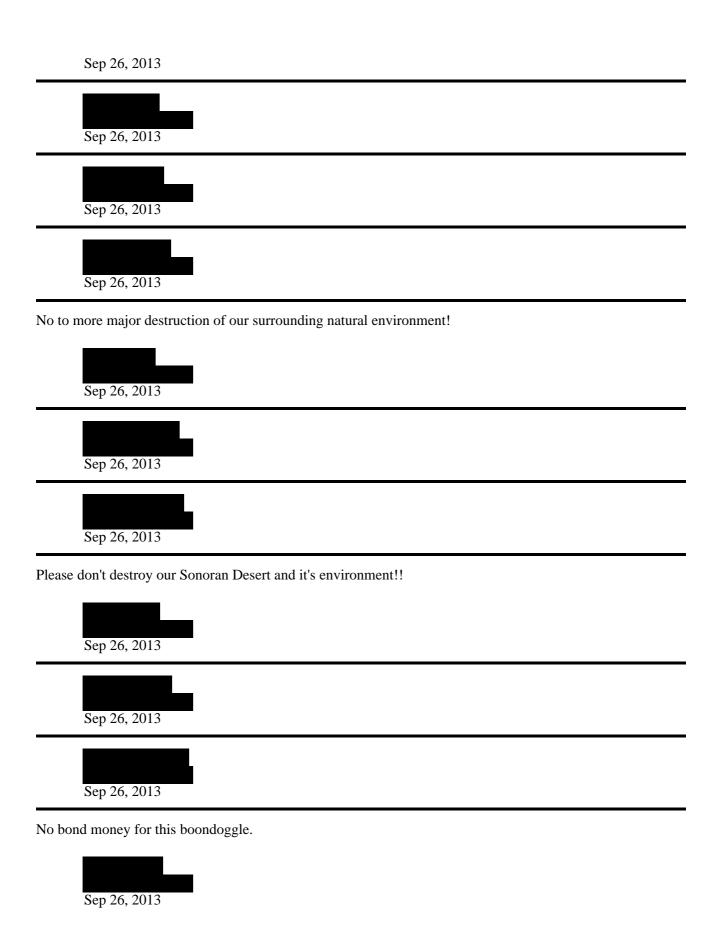
Having visited this beautiful desert valley area before, I fully agree with and support the statement herein.

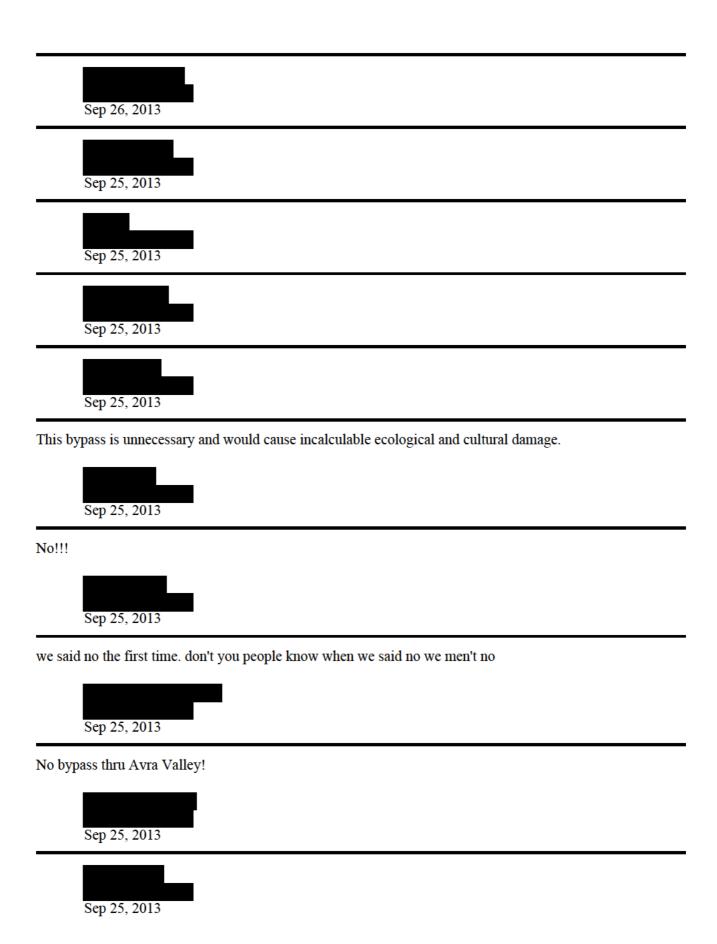


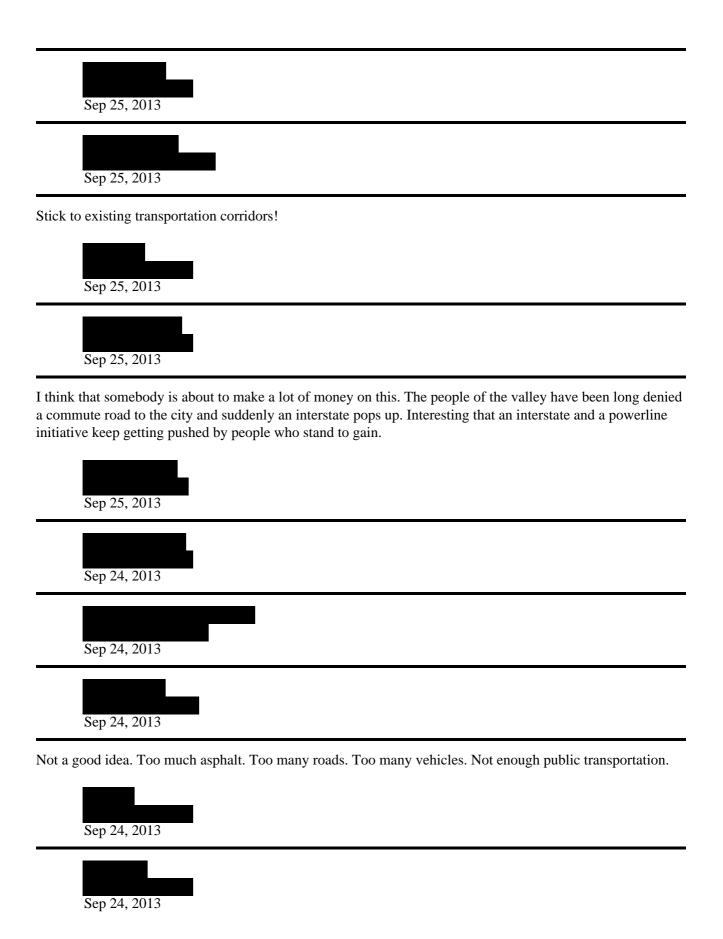


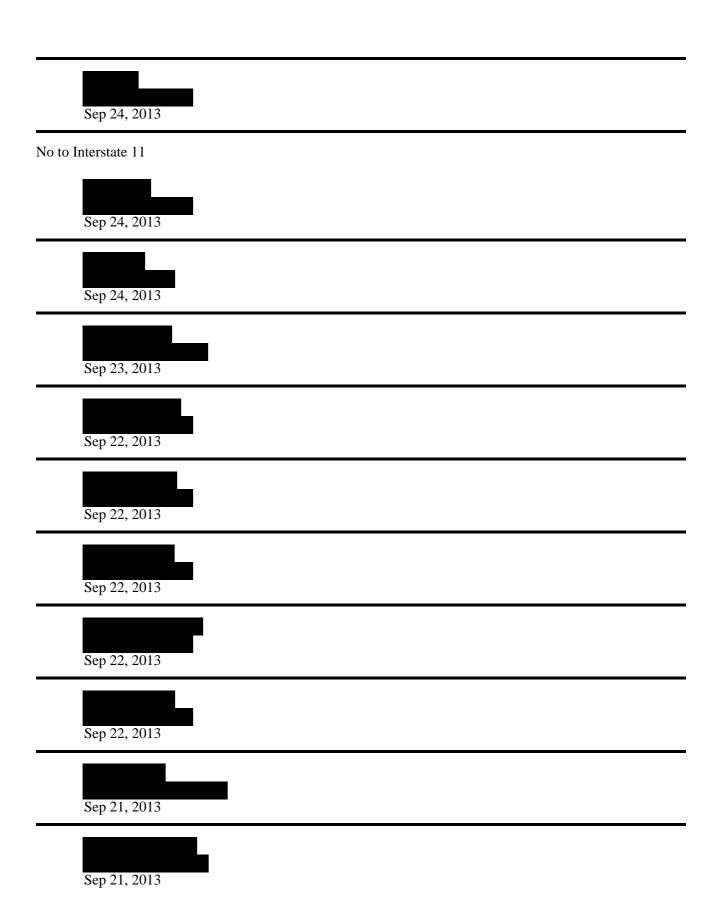
I recognize that there are economic benefits to the region; but there are equally serious negative environmental benefits, not to mention lack of water to support the future growth that this will cause. This needs way more thought and public discussion before it moves forward.



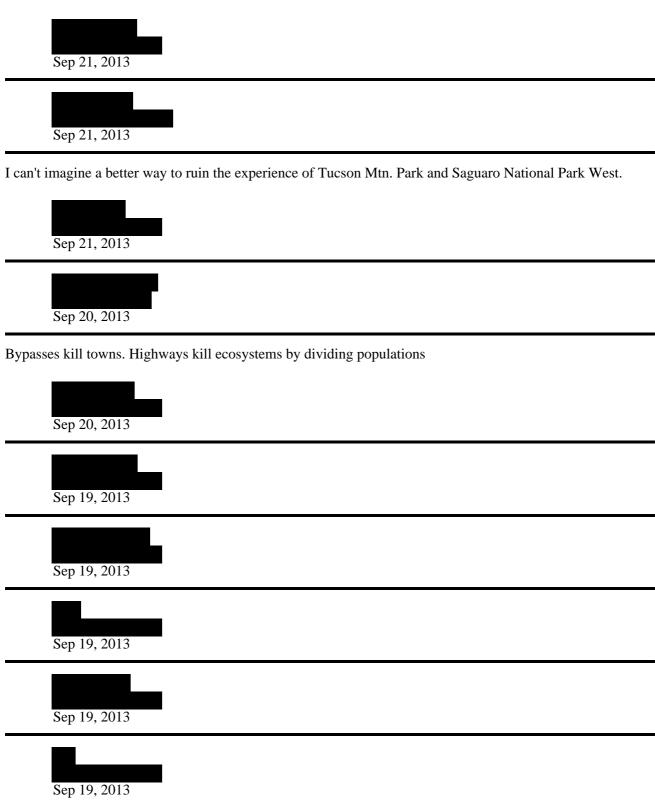




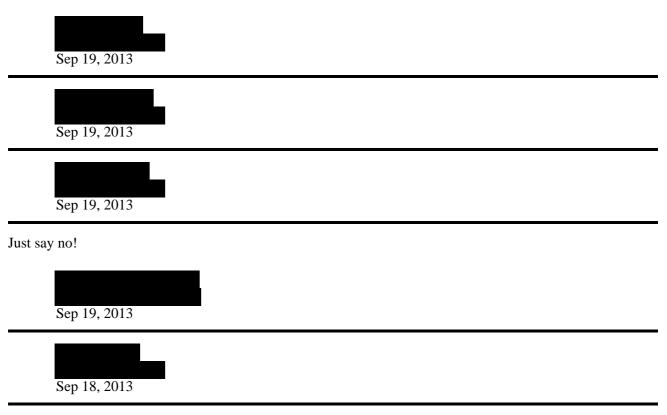




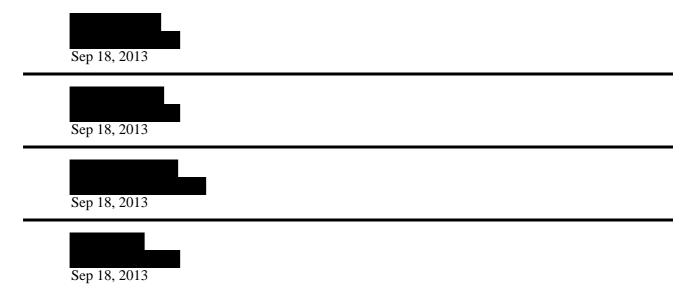
Both options C and D are terrible. I oppose any option that goes through this corridor, as it's impact will destroy not only the valuable natural beauty of the impacted areas, but have a severe impact on the yearly tens of thousands of visitors to Saguaro National Park, Tucson Mountains Park, and the Arizona-Sonora Desert Museum. Local livelihoods depend on the income these treasures provide. I strongly oppose options C and D.

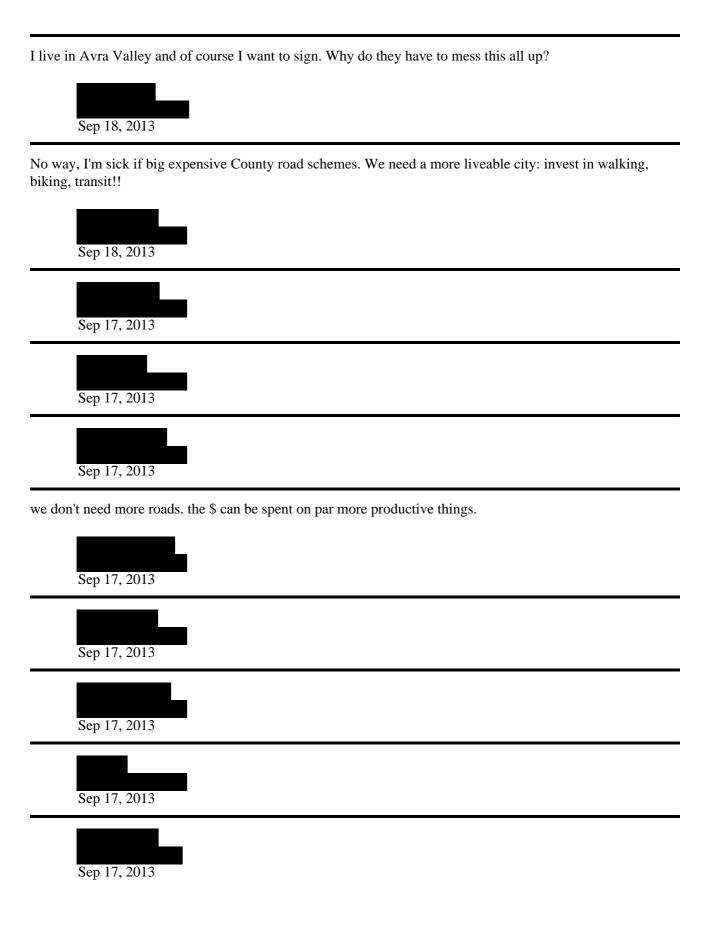


I strongly oppose any I-11 highway bypass through this beautiful Avra Valley - I believe Mr. Huckleberry needs to seriously think of an alternative before he's allowed to spoil this beautiful part of Tucson once and for all. There ARE alternatives, and they've been pointed out, so take a REALLY good look at them before allowing this rape of the Avra Valley.

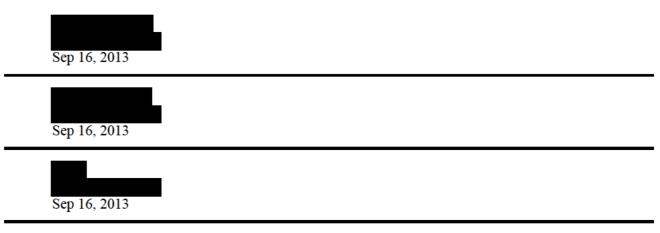


I agree, find another way that is not going to cost people their homes and make such a negative impact on the wildlife.





Nobody needs this. But if you're going to spend our money we can use safe bike lanes and sidewalks, underground electrical services, improved intersections, and many other useful civic facilities.

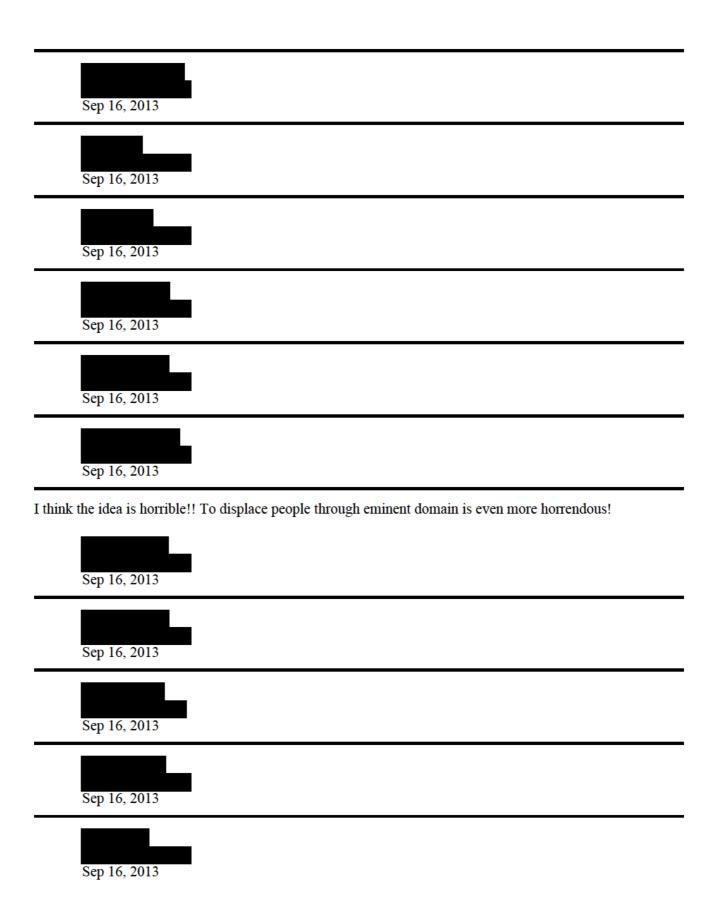


No more roads, please. The environmental impact will be devastating to our beautiful old Tucson desert. More wildlife will be pushed out of their native habitat and further endangerment of our rare fauna and flora. Please do not bring Interstate 11 to our state. Thank you for your time and endless efforts to create this wonderful city we have all grown to love.

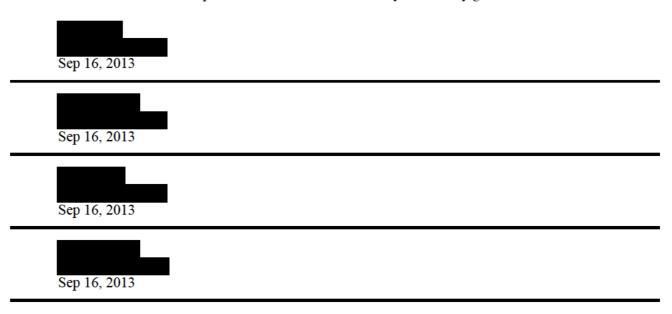


There is no need for another highway, and evidence shows that it will not alleviate any traffic despite common belief.

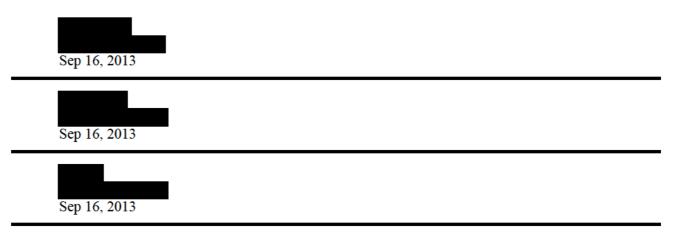




This is a terrible idea. Promoting bad sprawl while uselessly spending billions of dollars doesn't make any sense whatsoever. What little respect I had for Chuck Huckleberry is certainly gone.



I frequently visit this area for birding and other nature watching and related low impact outdoor activities. It is relatively unspoiled. Honor the 2007 resolution.



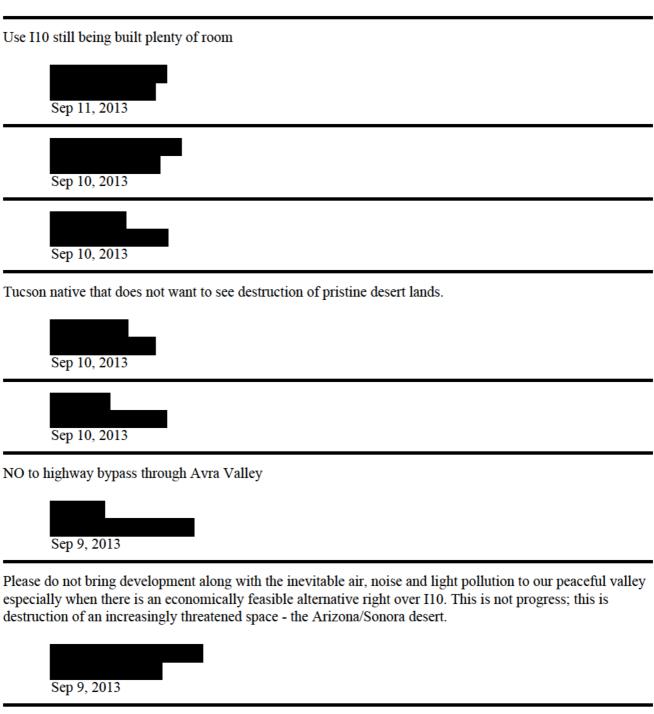
ridiculous-this is for a short cut and the gain of a few over the benefit of many



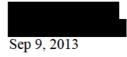
The highway is bad enough, but it would spawn abundant infrastructure that would further destroy the functional peacefulness and productivity of a desert wonderland.



No freeway through our valley! Email your friends and neighbors and let them know the scoop. Sep 15, 2013 Should of been told about this!!! What houses are involved? To tear up a national park too. Sep 15, 2013 NO!! No, no, no, no! Sep 14, 2013 Sep 13, 2013 Sep 13, 2013 I moved out here to get away from highways and such to enjoy the wildlife and tranquility. This is a new neighborhood! Sep 12, 2013 I appose the proposed I-11 bypass through Avra Valley. Sep 12, 2013 I live in avra valley Sep 11, 2013 Sep 11, 2013



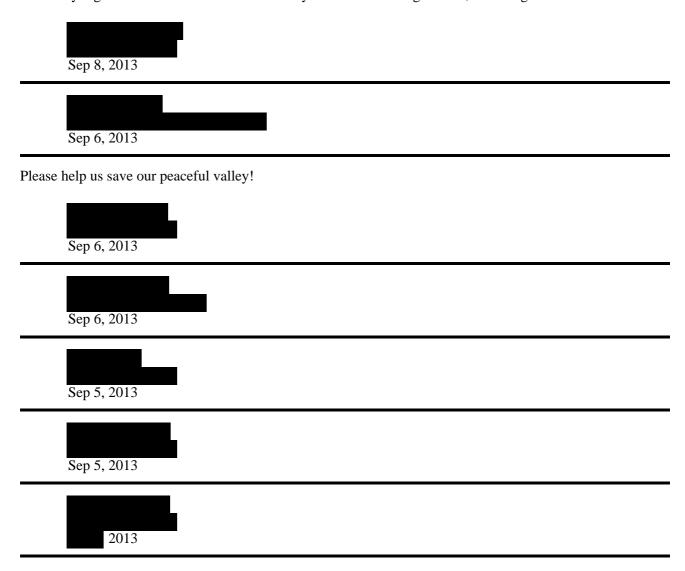
I Do Not Want the freeway



I believe this not only will destroy all we've been protecting around this area, but it will also provide a fast highway for illegal activity such as drug & human trafficking! Will kill animals known in this area & destroy many families lives & our all residents in Tucson Metro area in danger with illegal activity getting increased. Not to mention the money involved!!

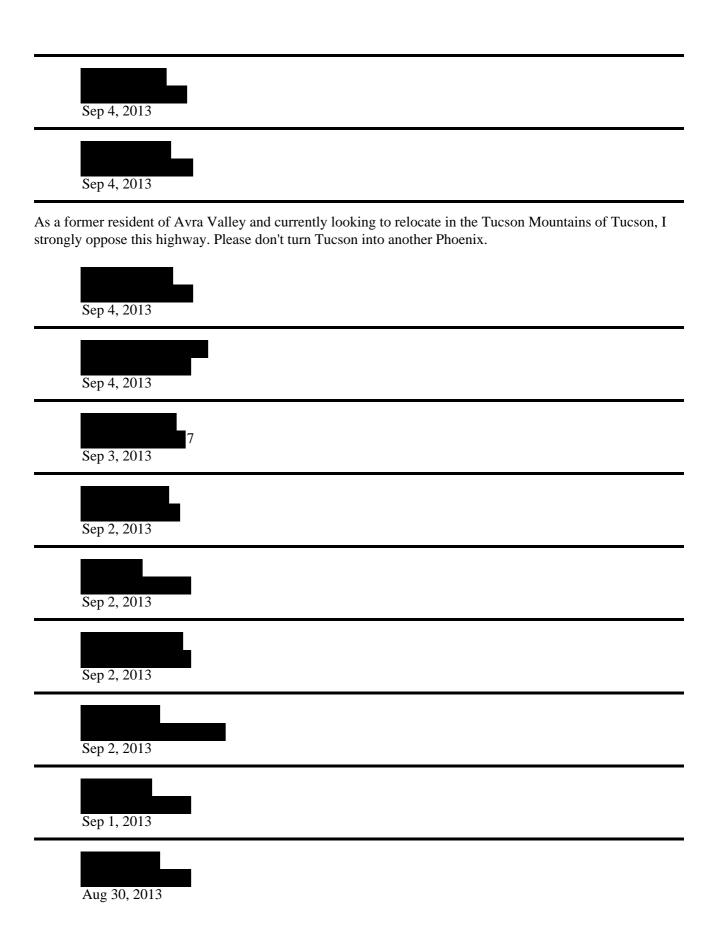


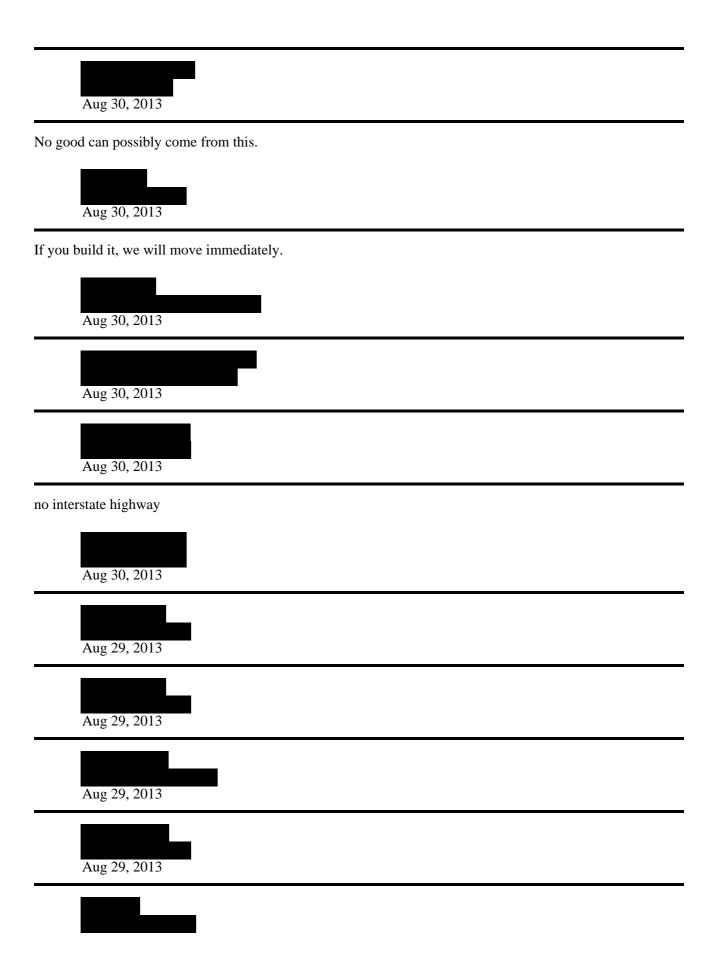
The reason we live in Picture Rocks is to get away from the city ,so don't bring the city to us. There is also an extremely high amount of Natural Wildlife that you will be harming as well, including thier habitat!

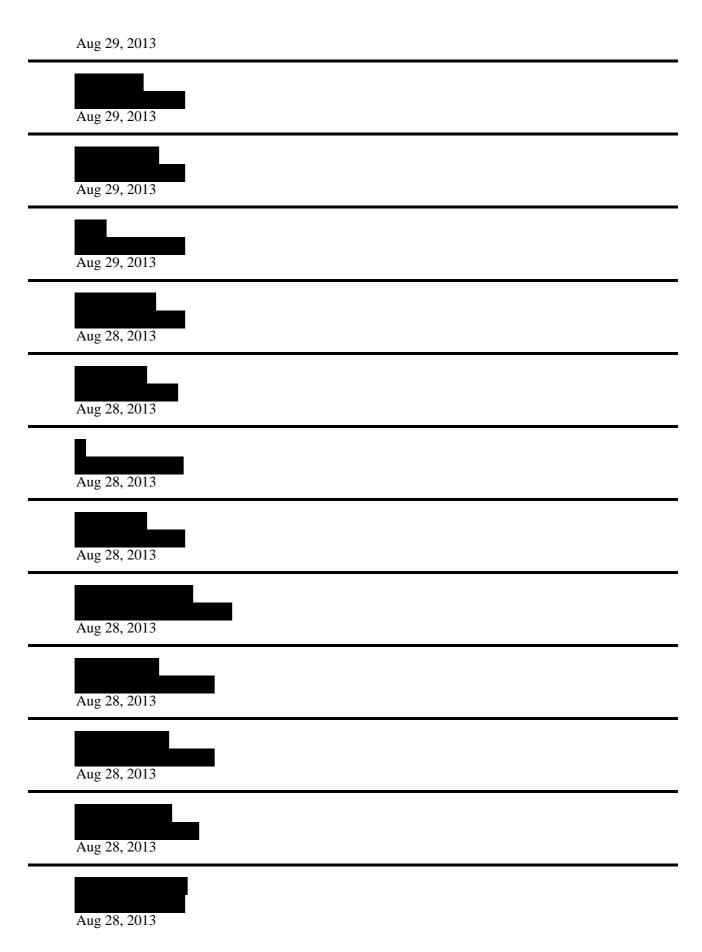


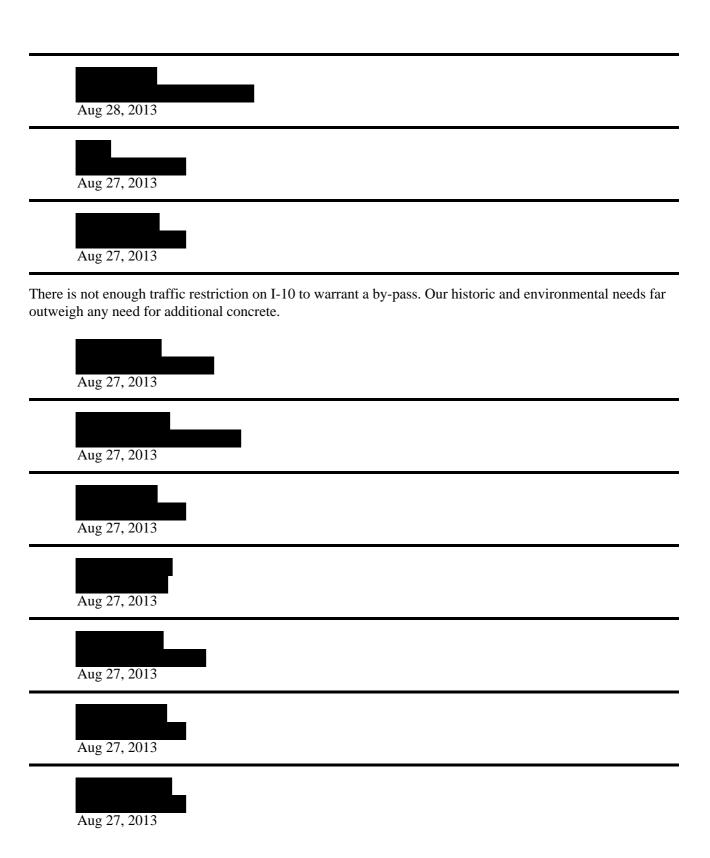
Chuck Huckelberry is a "huckelberry." What does he THINK he's doing!!??



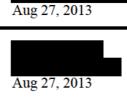


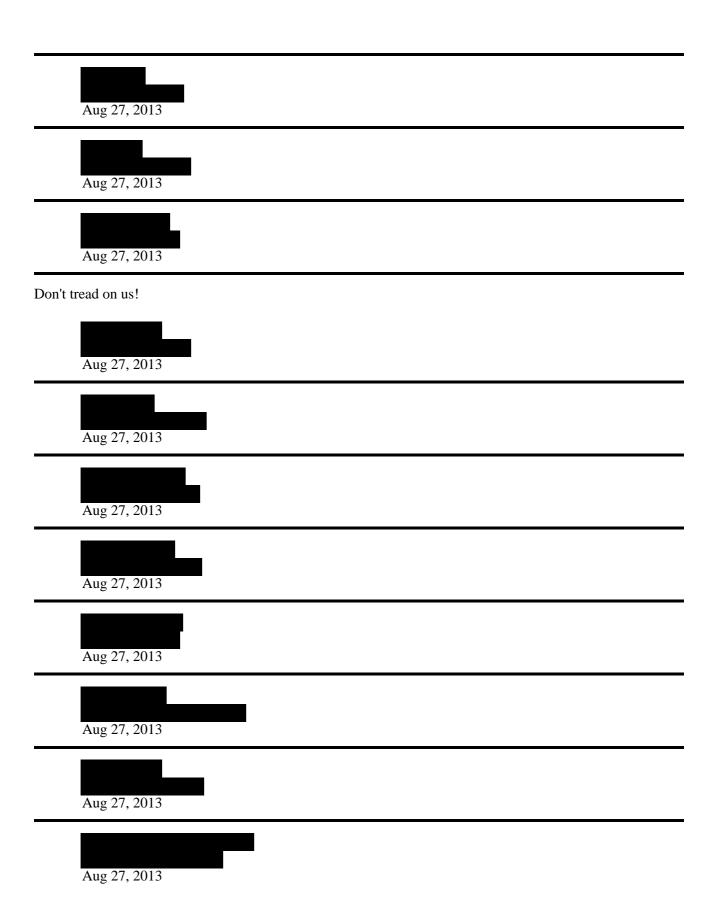




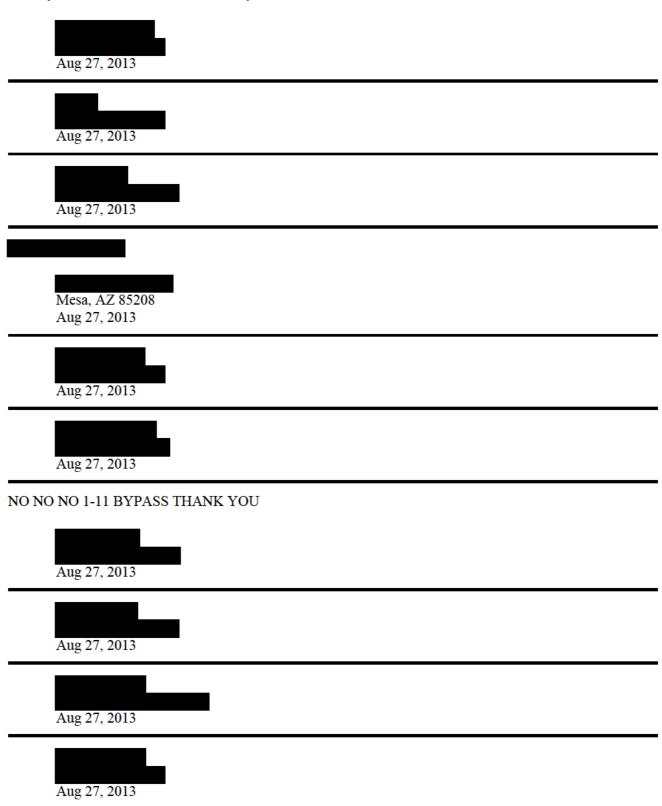


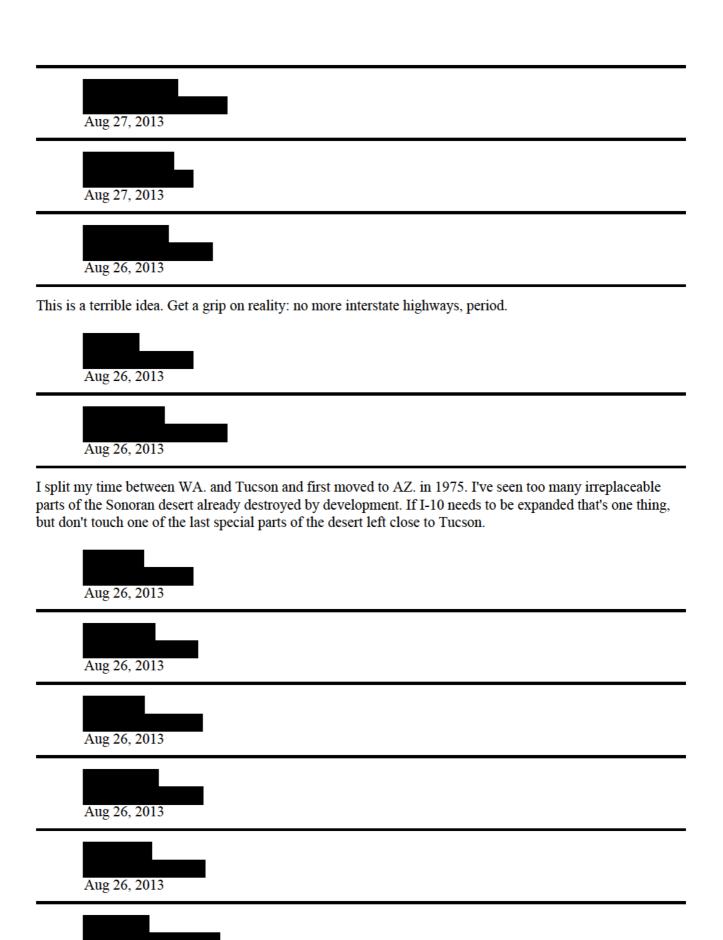
Let us not continue to pave over our desert in the name of progress. We've damaged the land too much as it is. This is all that there is. We cannot make more land nor replicate our delicate environment. Aug 27, 2013 Aug 27, 2013

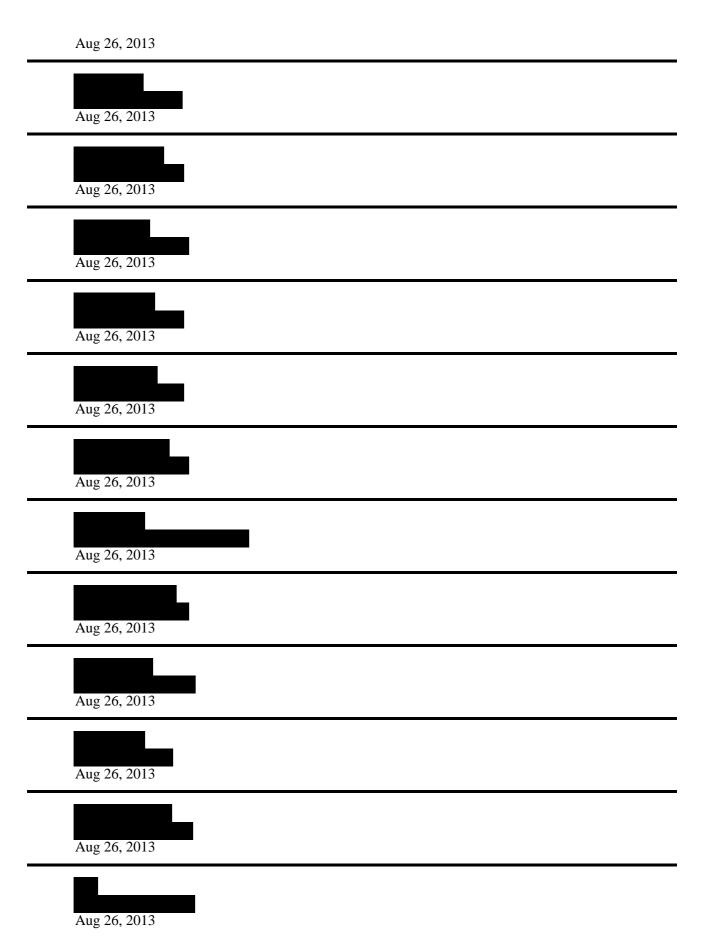


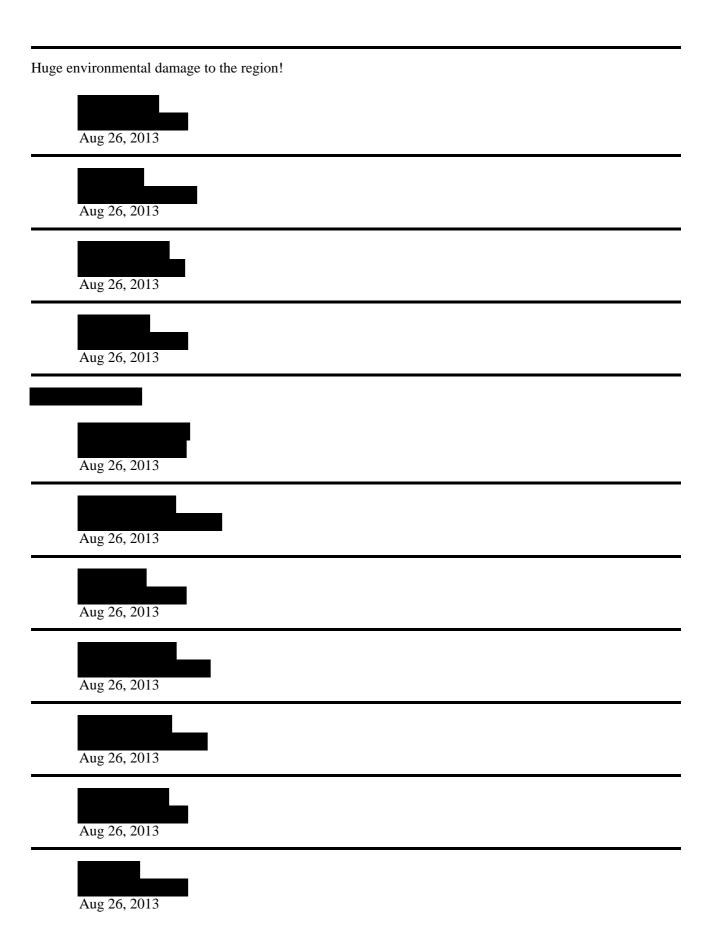


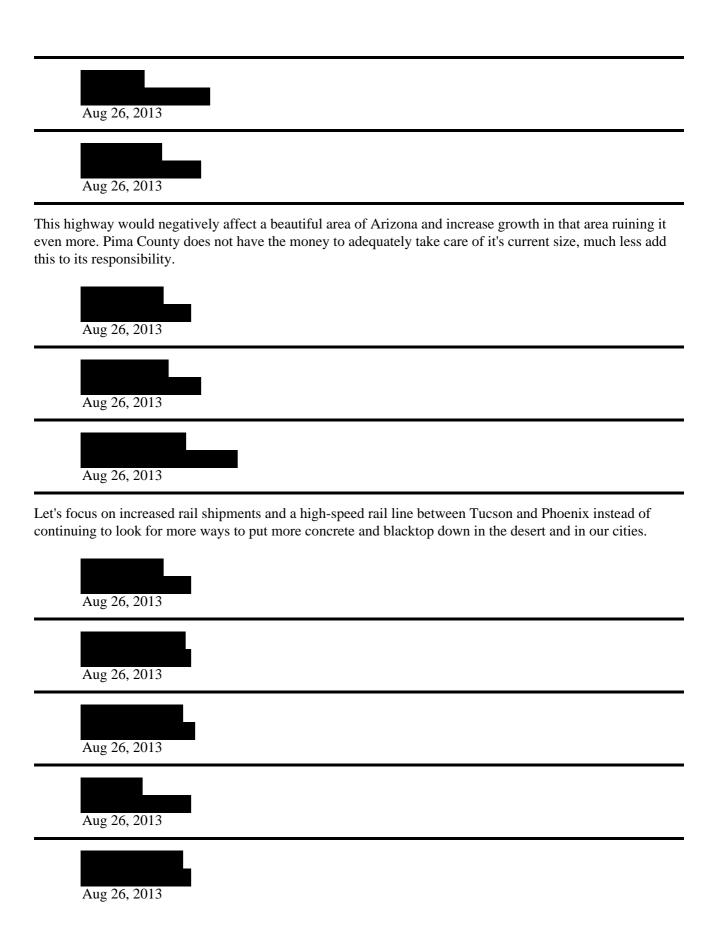
New bypass freeways rarely stay only bypasses - developers so often use them for suburban sprawl, and the valley is too narrow. It's really serene as it is and this "I-11 extension" as described would ultimately ruin the serenity of the Tucson mountains and beyond.













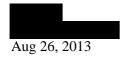
Much needs to be done before any possible decision for an alternative route can even be decided. What are the other Alternatives? Environmental and community impacts? etc.



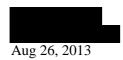
This is a shameless pro-growth, pro-development proposal with complete disregard for the desert and its inhabitants -- human and otherwise. The Avra valley, notably the western slopes of the Tucson Mountain range is already seeing deterioration due to the interference of the CAP -- despite the mitigation corridor. This is no way to treat the Sonoran Desert -- a unique national treasure.

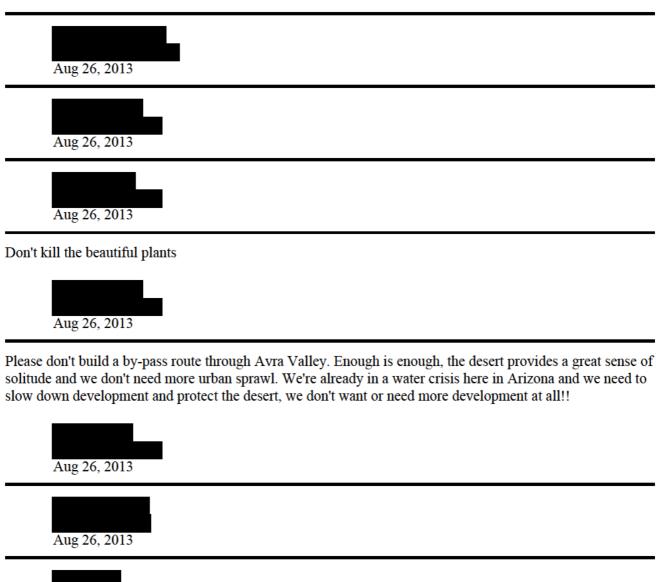


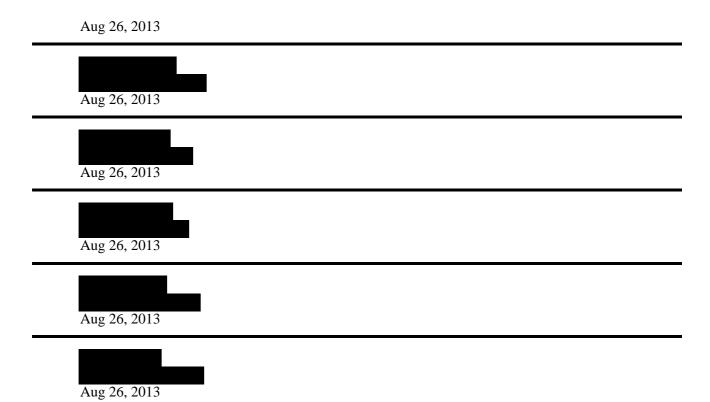
Thhis would destroy a beautiful part of our Sonoran Desert



Urban sprawl is killing us and the environment that sustains our livelihoods and the economy. This is a desert, not Chicago.



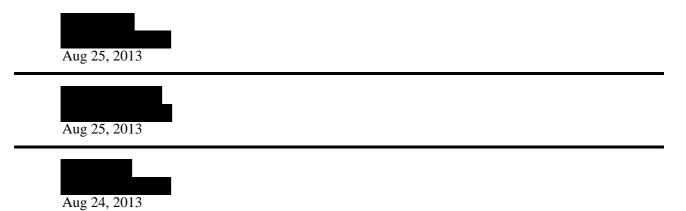




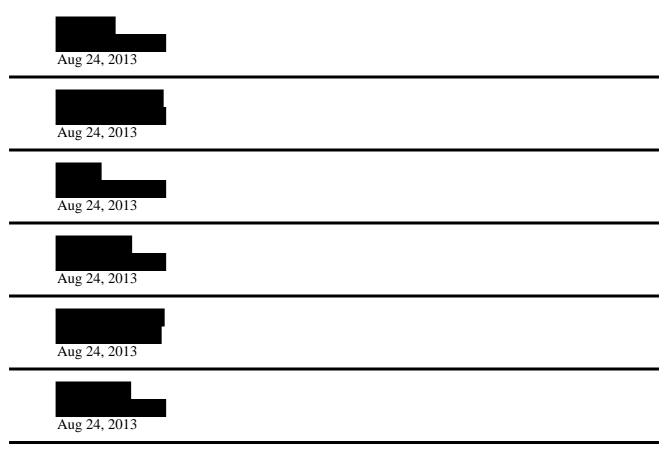
This highway is not needed and will trespass through some very sensitive, beautiful landscape. Our goal should be to reduce travel on highways, not increase it. This effort will jeopardize the whole bond election. Preserve southern Arizona.



I agree most heartily with Robin. She words her opposition quite well. I am against the proposal to construct an I-11 bypass.



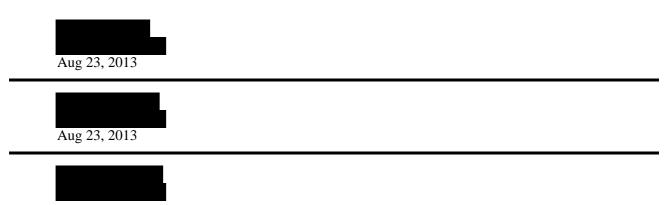
Thank you for reviewing carefully any plans to disturb the desert for yet one more highway. We must responsibly protect the desert lands, its history, culture, sustainability - Please consider alternative, creative ways to meet all the needs without building one more highway. Many thanks, Jhan



Stop urban sprawl and noise pollution from creeping into our beautiful valley. The beauty and preservation of AZ Sonora Desert Museum and Sahuaro National Park West would be also be destroyed. Go elsewhere with this plan.

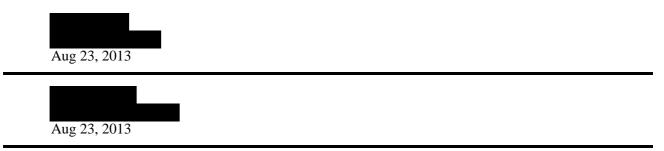


I am 100 percent opposed to i11 through picture rocks on any route. I am for i11 on i10.

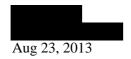




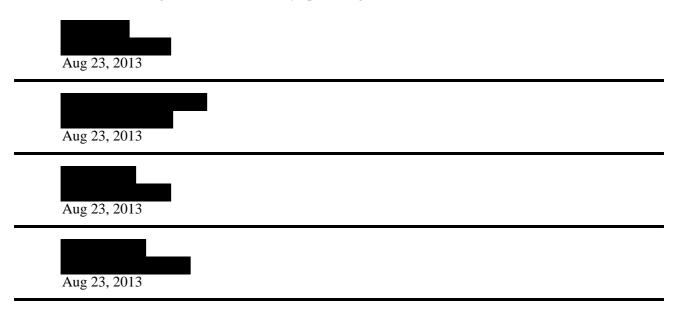
Yet another reason to oppose the I-11 Bypass route proposal is that rapidly developing autonomous vehicle technology will reduce headspace (safe distance between vehicles), thus dramatically reducing highway congestion. The I-11 bypass proposal is based on outmoded thinking and is entirely unnecessary.



Please do not destroy the Avra Valley, Saguaro Park West and the Ironwood Forest National Monument. Consider using existing I-10. Do not destroy more of our Sonoran Desert.



This proposed route is totally impractical, because of the impact it would have on our beloved Tucson Mountains and the damage it would do to a very special region of our state.



Cancerous "bypass sprawl" is not environmentally responsible. We need to figure out how to reduce local traffic on I-10.



There are sufficient freeways to serve the needs!



Aug 23, 2013

I agree with all the points in this petition.



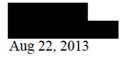






Aug 22, 2013

As a near by resident of the proposed route I can say that this highway would destroy unnecessarily an undeveloped piece of natural beauty.

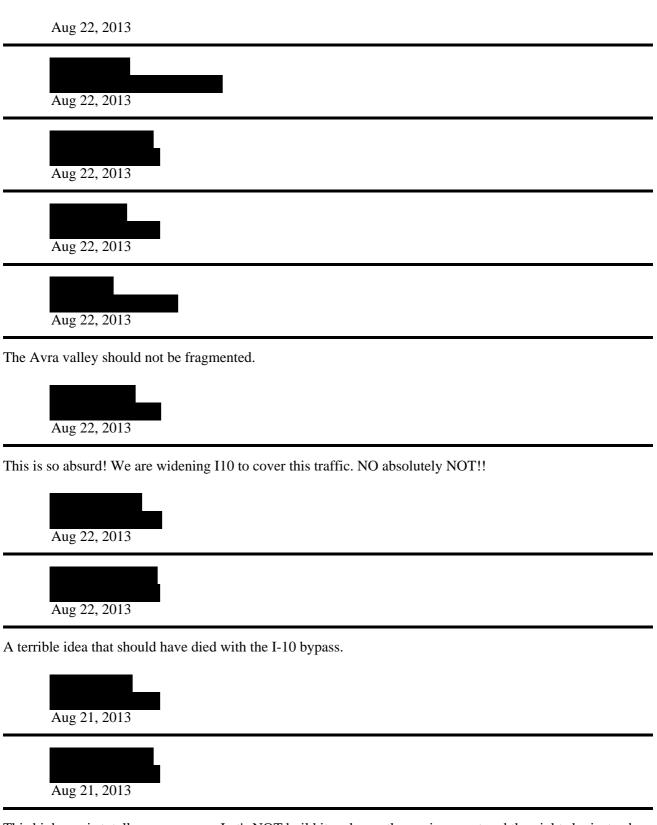


Putting in this interstate would destory the natural beauty surrouding the Sajuaro National Forest.



Aug 22, 2013

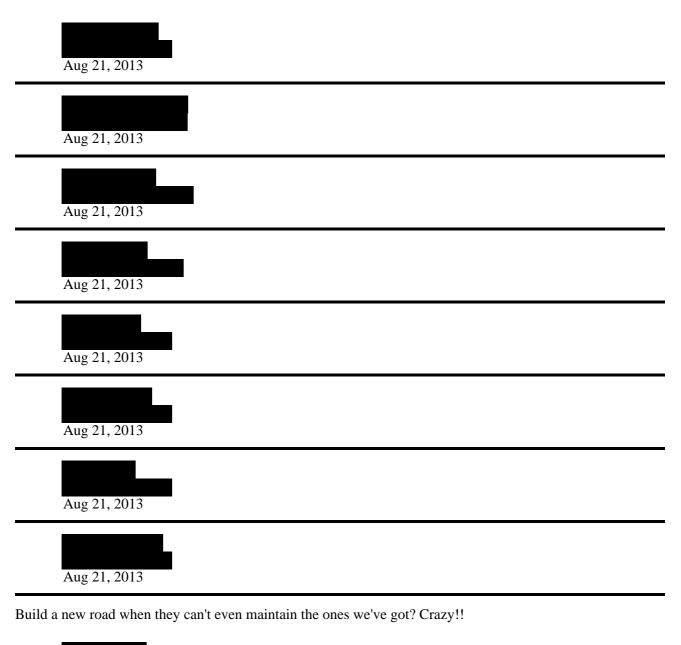




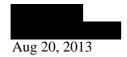
This highway is totally unnecessary. Let's NOT build it and save the environment and the night sky instead.



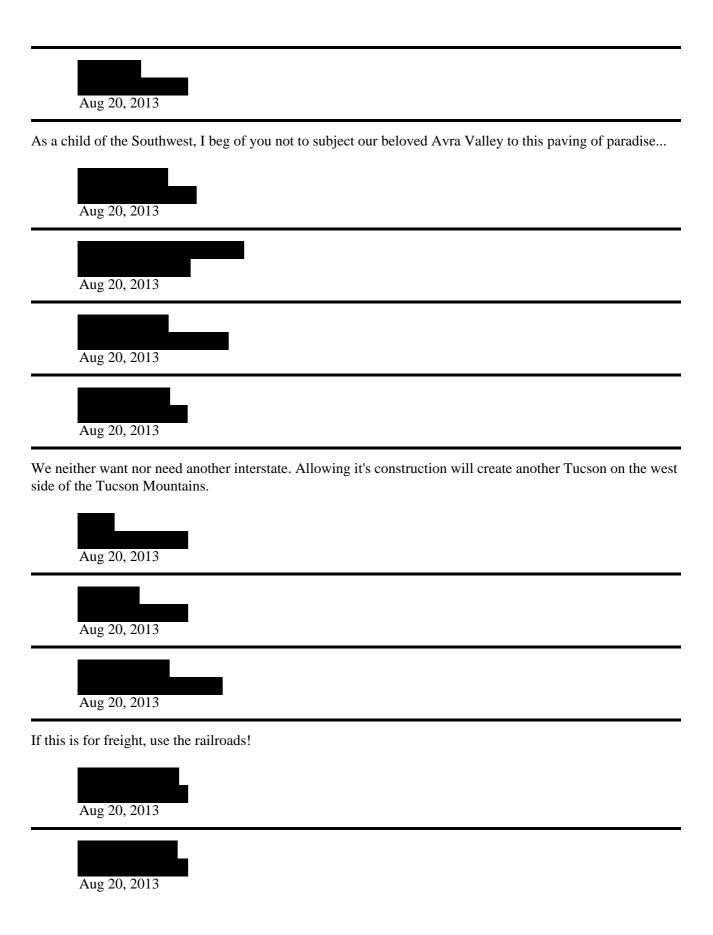
No I-11 through Avra Valley. Why affect a valuable area of Southern AZ when it would make so much more sense to add this interstate to the existing I-10 corridor. Why is money always a primary factor when our environment is at risk?

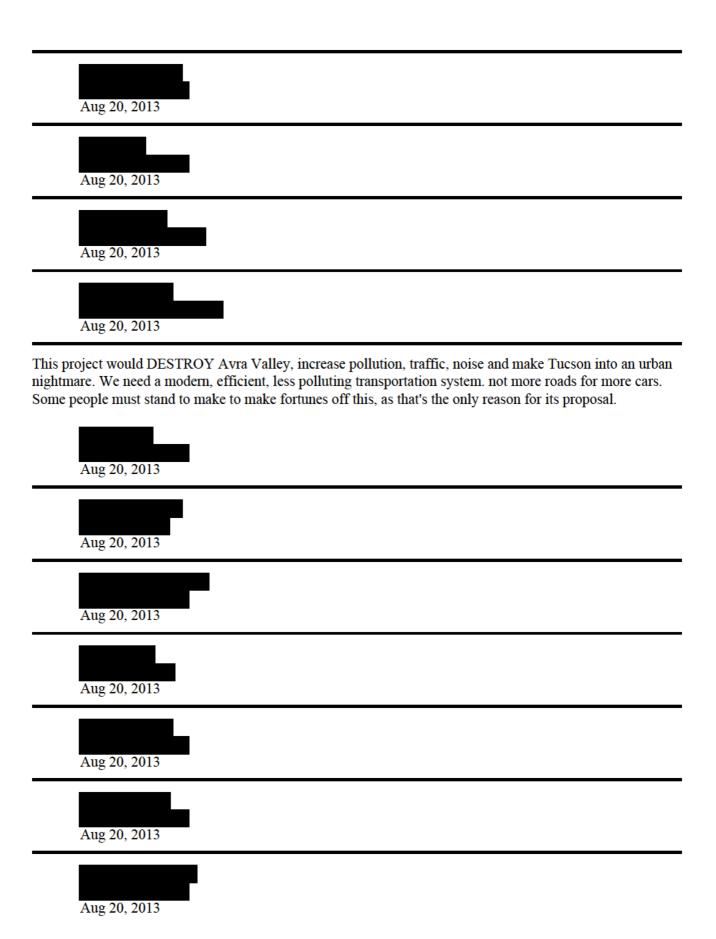


An Interstate highway through the Avra Valley would be a travesty of this desert environment and the history and archeology of this special place.



Aug 20, 2013

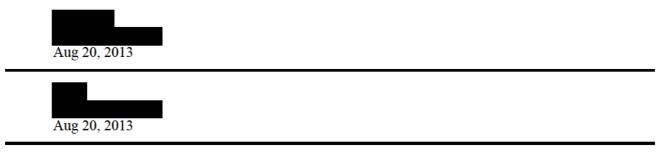




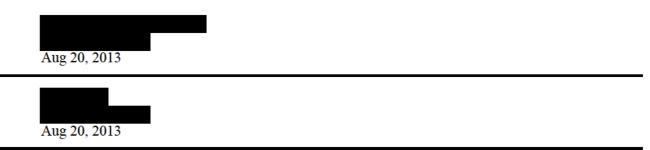
valley viewshed and ecosystem ruined by this. Please reconsider. Aug 20, 2013 Aug 20, 2013 Aug 20, 2013 Aug 20, 2013 There has to be a better way that's environmentally friendly! Aug 20, 2013 Aug 20, 2013

An interstate highway must have exits, and every exit will be a nexus for commercial development. I see a

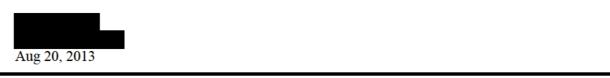
This freeway will not help anyone! Traffic on i10 is never heavy enough to support this project. We need high speed rail not more freeways!



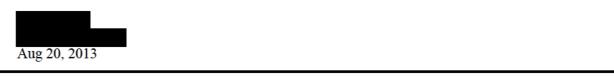
Let's use I-10 & I-19. It seems the costly 'I-11' scheme is quietly aimed at more urban sprawl in Pima County.



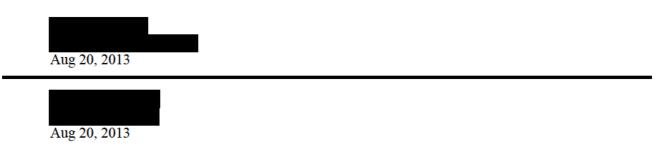
This is a time when we should be concerned about global warming and its impact. A full 6% of the world's energy goes toward cement production. Highway creation is very high in CO2 produced with energy used for cement and steel. Additionally, desert spawl, which the Avra Valley option would foster increases CO2 production.

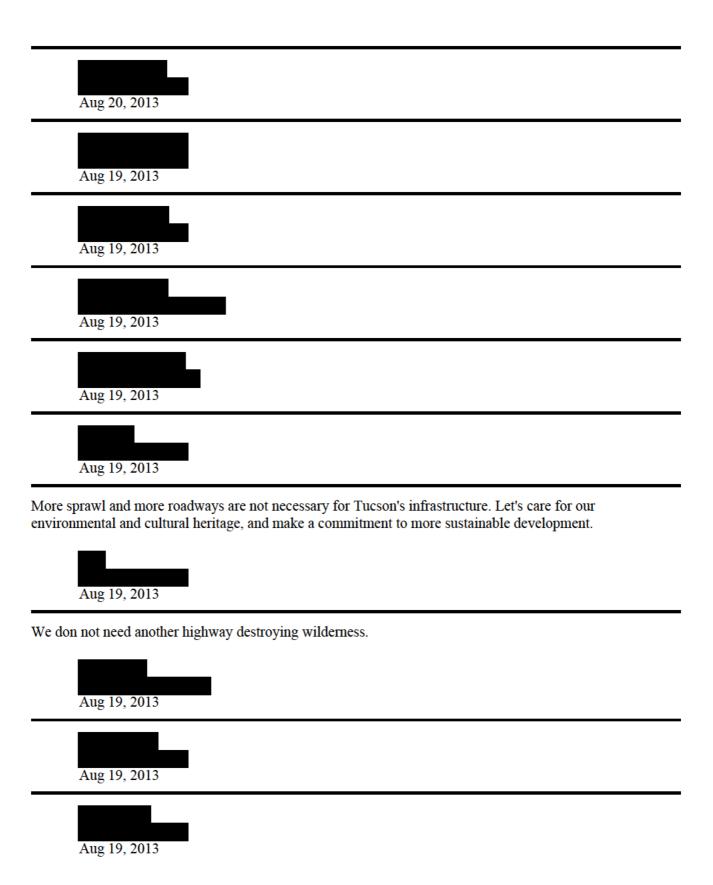


We dont want a bypass through our beautiful desert, face it, you guuys ruin everything youtouch! Leave nature alone!

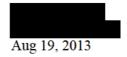


I love every inch of Arizona and don't want to see one more square mile of it despoiled by chewing up any more of it's wild beauty with a bypass



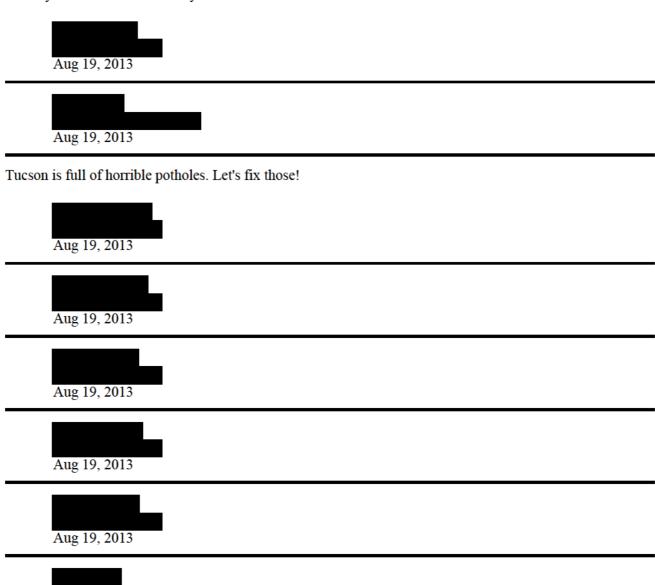


Am 1 mi W of Sandario, 1, mi N of Ajo Way--am opposed to any new construction labeled "Hwy 510" through the Sandario/Saguaro Natl Park area--the time for Big Highways & clearing new land is clearly over--double deck the existing freeway in Tucson for ecological and financial reasons--the only route that makes sense.

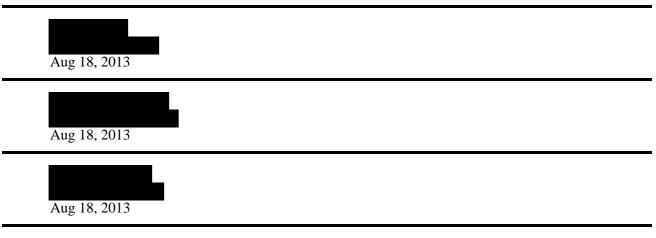


Aug 19, 2013

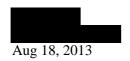
It would be a shame to tear up Avra Valley, where most residents treasure the quiet, close-to-nature lifestyle that it now provides. Wildlife has already been disrupted by the CAP. despite all attempts at mitigation. A freeway would be immeasurably worse.



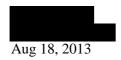
There surely is an alternate to a route through Avra Valley--one which will have less negative environmental impact. Aug 19, 2013 Aug 18, 2013 Please do not proceed with this project! Aug 18, 2013 How can we help come up with an ecologically and economically sound alternative??? Aug 18, 2013 Aug 18, 2013



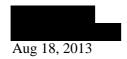
The nation's huge freeway system is not sustainable - expanding it is folly.



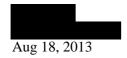
Time and time again, local residents have worked together with county, state, and federal entities to set aside lands from development to promote the conservation and preservation of our natural and cultural resources. This plan flies in the face of the hard work that has been done to date.



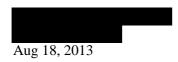
Too expensive, and too much destruction of habitat. Double-deck I-10 instead -- it's three times less expensive.

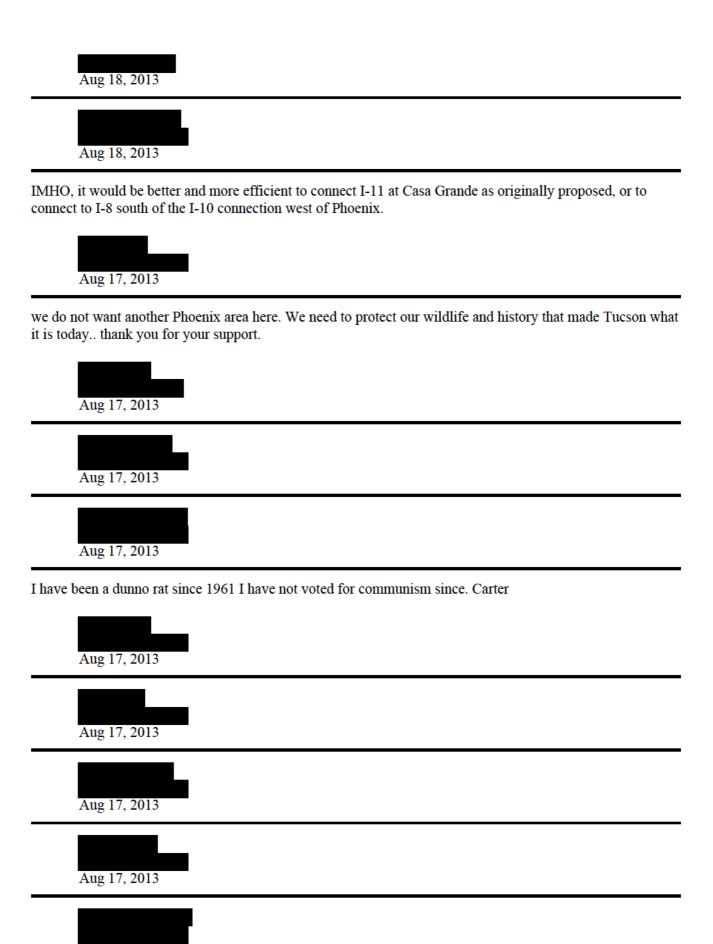


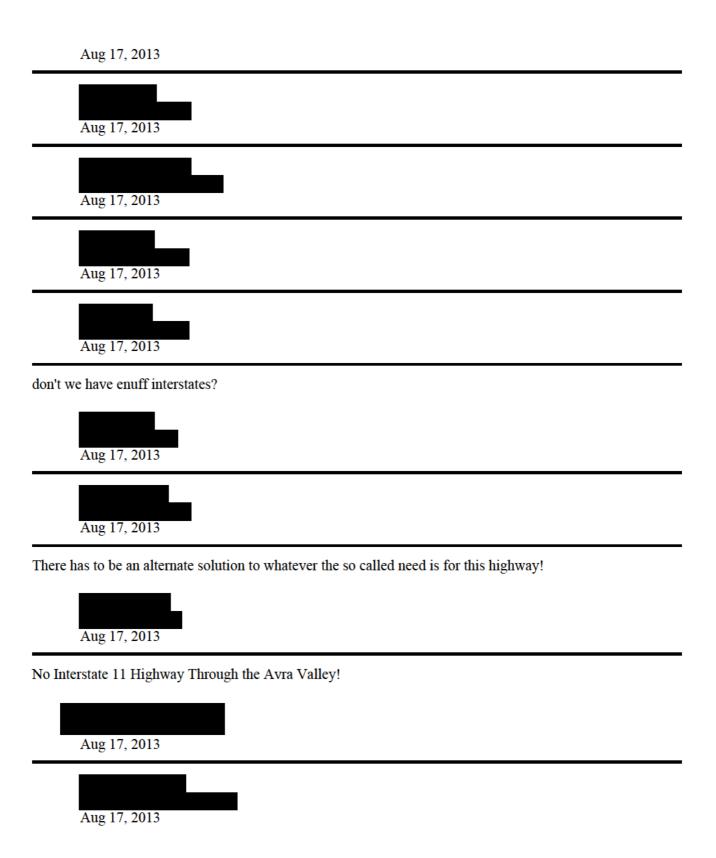
Saguaro National Park and the Arizona-Sonora Desert Museum lie in the pristine desert habitat on the west side of the Tucson Mountains. I 11 would create a small commercial city through the valley destroying the views and appeal to thousands of money bearing visitors to the Tucson area.



Highway is important, however, please put it another place that doesn't affect so many people and animals.



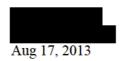




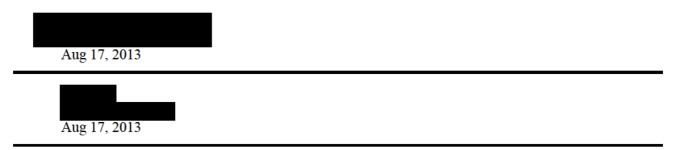
The I-11 bypass overlooks the value of our natural resources. Tourists come to Tucson to enjoy our weather but also to see the beautiful Sonoran Desert. The Tucson Mountains are the easiest way to explore the desert. Having a freeway run through the Avra Valley would destroy this valuable resource.



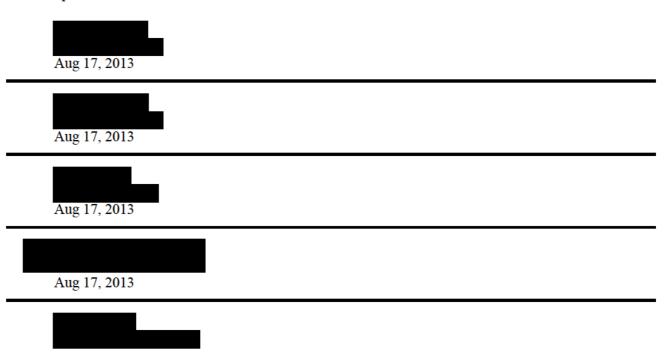
As a Pima County taxpayer, I strongly oppose the plan. This is a beautiful area that would be destroyed by the bypass. It would come within a mile of my property, and the resulting of noise and pollution would be unacceptable.



Why would we want to blade more pristine, sonoran desert land to put in another roadway close to saguaros Nat'l park, west and the ancient picture rock and signal hill? NOOOOO.



The negative impacts of this unnecessary route far outweigh any slight advantages. Let's not destroy another beautiful part of Arizona!



no I-11 through Avra Valley

Aug 17, 2013



Aug 17, 2013



Please, for the love of God, do NOT let this interstate be built. it will ruin one of the most beautiful pieces of land in America.



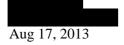
Aug 17, 2013



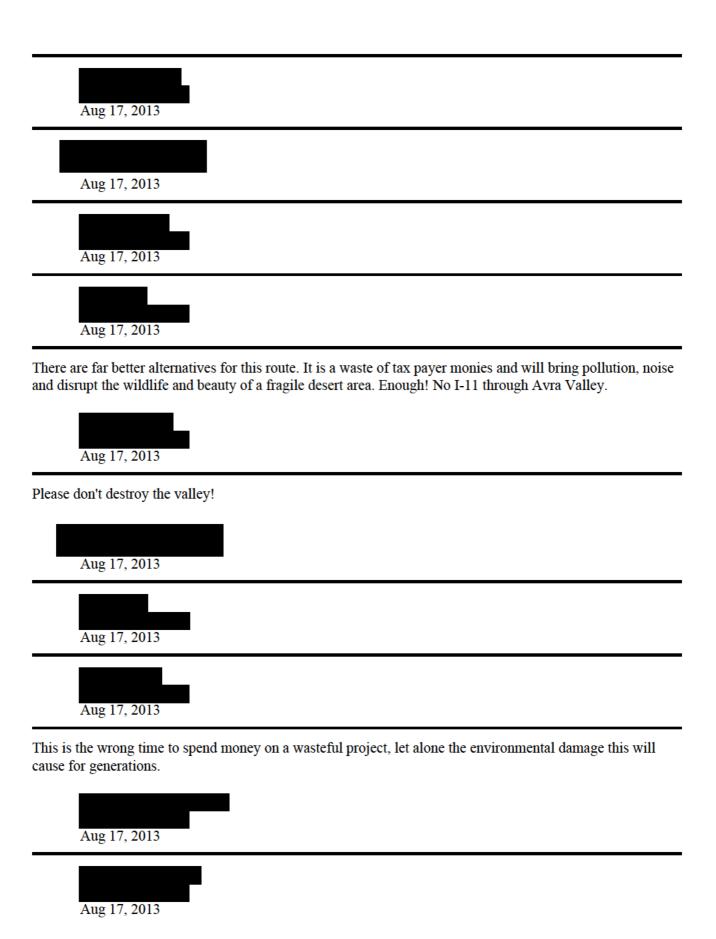


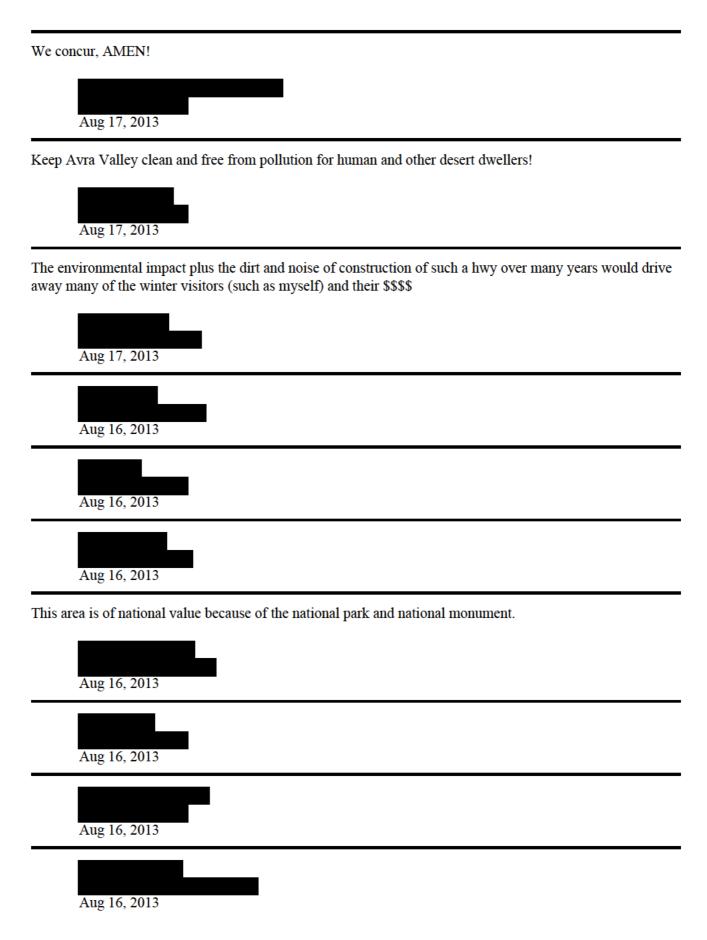
We do NOT need another freeway. It's time to protect what's left of the natural treasures of this state and keep the existing environment safe.

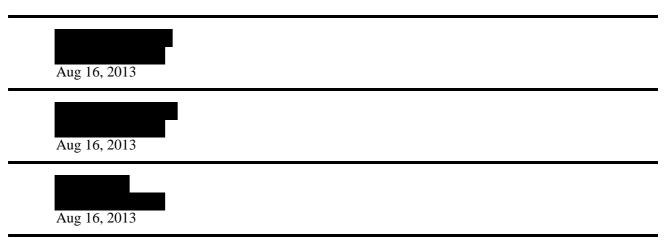




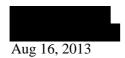
As as former Tucson resident, I often enjoyed the wild, scenic and peaceful Avra Valley, and nearby sites like Ironwood Monument, Saguaro Park, and Tucson Mountain Park. Aug 17, 2013 This highway would be detrimental to the ecology of Avra Valley. It would be detrimental to Tucson's economy, which depends on interstate traffic. Aug 17, 2013 Aug 17, 2013 Stoip the I-11 Bypass Route! Aug 17, 2013 Aug 17, 2013 Aug 17, 2013



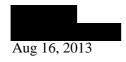




This has been labeled a "Freight highway" to most of us residents in the Avra Valley area. As there is already a freight depot at the Nogales border, AND a huge rail yard has been approved at Red Rock, AZ, 20-30 miles W of Tucson, why not just add additional rail lines for this "Freight" to be railed too and make a truck hub near or around the Red Rock rail yard facility, thus eliminating all this huge ADOT expenditures, (so much cheaper to ship by rail anyway), and Red Rock does not have anything near the population of Tucson, let alone Avra Valley, is practically out in the middle of nowhere!! Has this alternative ever been looked into or proposed?



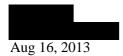
THIS SHOULD NOT EVEN BE AN OPTION!



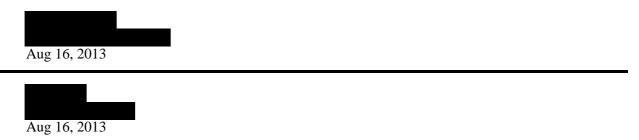
That proposed new fwy would give me freewy front property. No Thank you!



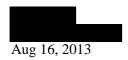
It is a crime against the environment and against our ancestors to destroy beautiful wildlife habitat and archeological resources.



America's past was defined by rapacious exploitation. Her future will be defined by balanced conservation.



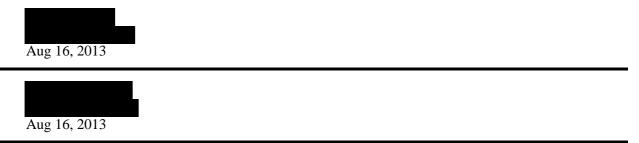
Stay out of Avra Valley and double deck the current I-10.



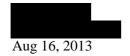
get permission from the TohonoOodham nation to put a tool road as the by pass on their land and let them have the income from the road to use for health care of their members



Keep our dark skies dark! Kitt Peak will be affected by highway lights, as well as the residents in Avra Valley. Don't take away my Milky Way!

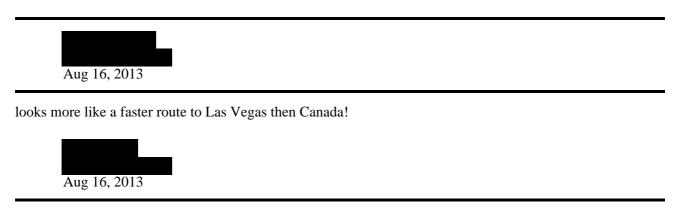


Those 18 wheelers on the hi way will smog up this valley. I live near Sandario and Mile Wide so they will prolly take my house too and I love my acre!

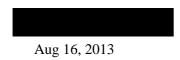


Please don't do this. Let's commit to ecologically sensitive development projects for the folks who live and work here, and less enormous, expensive road-building!

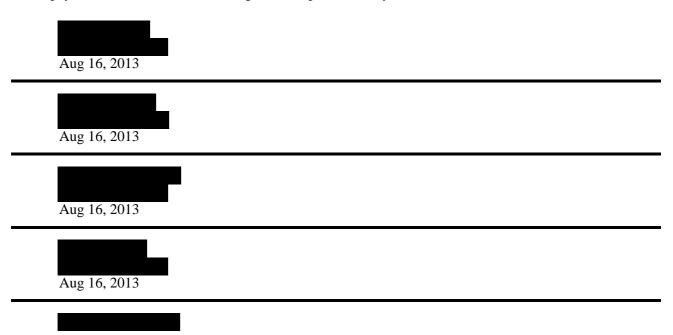


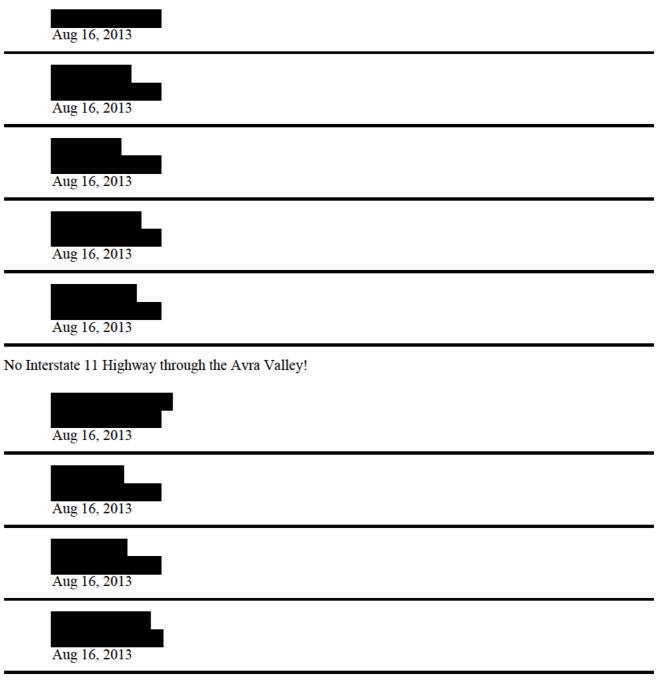


Outrageous destruction of natural habitat for so much wildlife and the unique beauty of the Sonoran Desert.

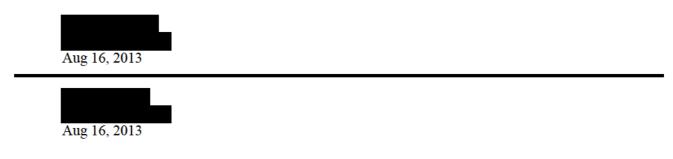


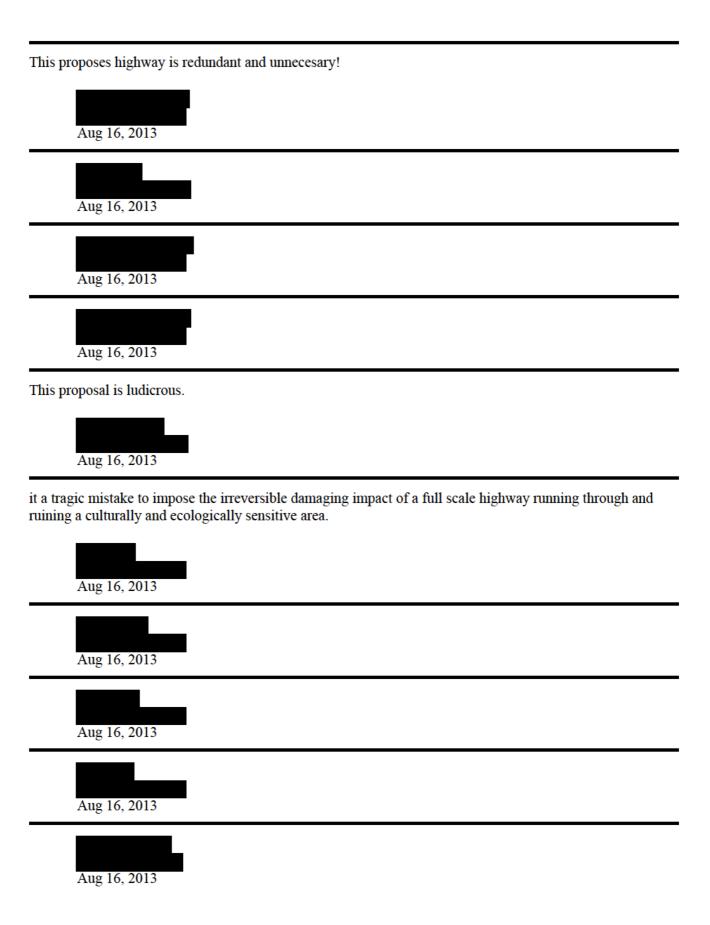
We voted this down in the last election. It will cut off wildlife movements between the Tucson Mts and what remains the only untouched portion of the AZ Sonoran Desert close to Tucson. It will hurt the tourist trade as the Saguaro Park West is the #1 favorited destination. This bypass will enable drug runners an easy path for moving Mexican drugs north, west and east into the US. It will pollute the environment with the fumes from diesel engine semi-trucks hauling produce from Mexico. It is also a violation of the Environmental Justice ruling to protect low-income homes from industrial pollution. We already have sand and gravel pits and Portland Cement on Avra Valley Road. We have two dumps, one at Tangerine and one large one on Avra Valley road. We have the limestone open pit mine that has devoured one of the Twin Peaks and is building up high mounds of waste rock. We have the Marana Airport, and a Solar Panel Farm. We have heavy Waste Management trucks tearing up our roads and polluting the air. We have the CAP Canal and Silverbell Mine. We also have Native American historical sites and religious sites. We have crop dusting planes to spray fields and defoliant on the cotton fields. I-11 will cost billions of dollars more than double decking 9 miles of I-10, and our taxes are high enough. Follow the money and see who will profit the most from this highway while the taxpayers foot the bill. Please vote against this plan. Thank you.

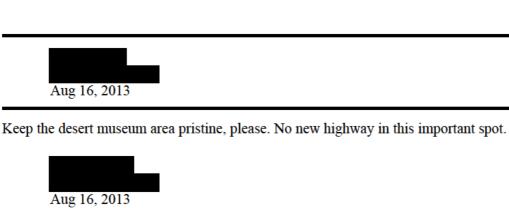




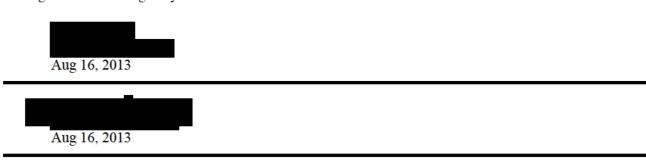
The idea of adding a new Interstate at this time in our economy and planet and society is downright mischievous and quite insane. Whatever could you people be thinking of? With all the road improvements and other things in the area that we need, why is this idea being seriously considered, again?? I went to a meeting some years back about it and hoped that sense would prevail. Shall I still hope?



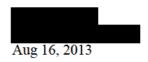




I visit the area where the highway is proposed to be built and I can say that not only would it bring devastation to the land and animals in the area but the light pollution would be detrimental to Kitt Peak. In addition to the reasons I have already mentioned, the noise pollution to the area would greatly impact the people who live in the area. I don't see why a bypass is even needed as you already have a great system in place with the frontages next to the highways in town.



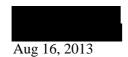
An interstate highway through the Avra Valley of Arizona is a bad idea whose time came and went thirty years ago. It will not bring prosperity to Tucson, but it will bring destruction to wildlife habitat and human neighborhoods. Chuck this Huckleberry Highway!



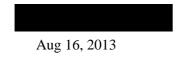
we cannot afford these highways financially and/or environmentally!



As a small business owner of a vacation rental overlooking the Avra Valley, I can attest to the importance of maintaining the peace and solitude of this area as an economic matter. We do not need the urban sprawl that would result from an intrusive highway through this area with its important historic, environmental and archeological assets.



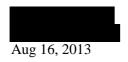
CHUCK THE HUCKELBERRY HIGHWAY!! Save the Avra Valley. Double-decking six miles of I-10 is cheaper and according to ADOT, will do everything they want done.



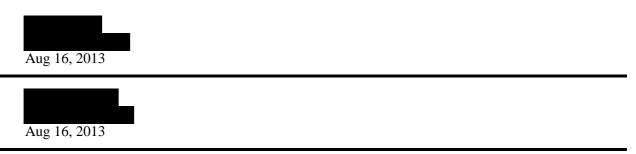
A DOUBLE DECKER HIGHWAY OVER I10 IS WHAT NEEDS TO BE DONE TO SAVE MONEY AND DESTRUCTION OF THE IRREPLACEABLE DESERT.



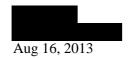
It would be a travesty to ruin the beauty of the unique saguaro forest in the Avra Valley with the noise, air and visual pollution of the proposed bypass.

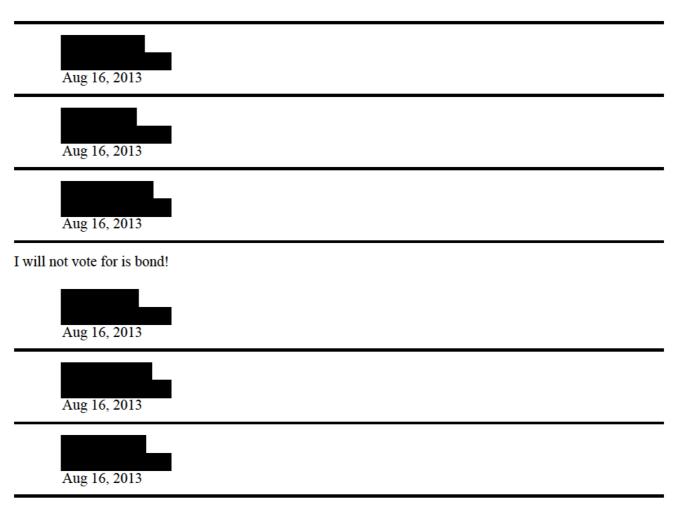


This is a ridiculous proposal. The damage and losses to a beautiful historic, area, the environment, wildlife habitat, and the people who reside in the area is not even remotely justified by the minimal benefit this project will provide. The wishes of the people should always take precedent over business interests. The people ARE the economy, and the people themselves will decide what is in their best economic interests.



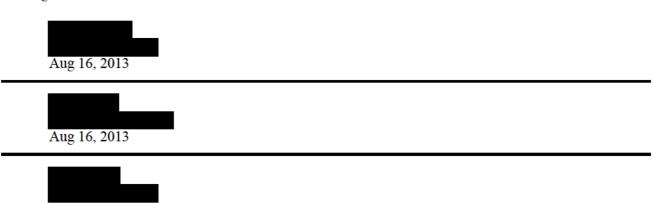
As an Avra Valley property owner, I strongly oppose any proposals to run the 1-11 highway through the Avra Valley.

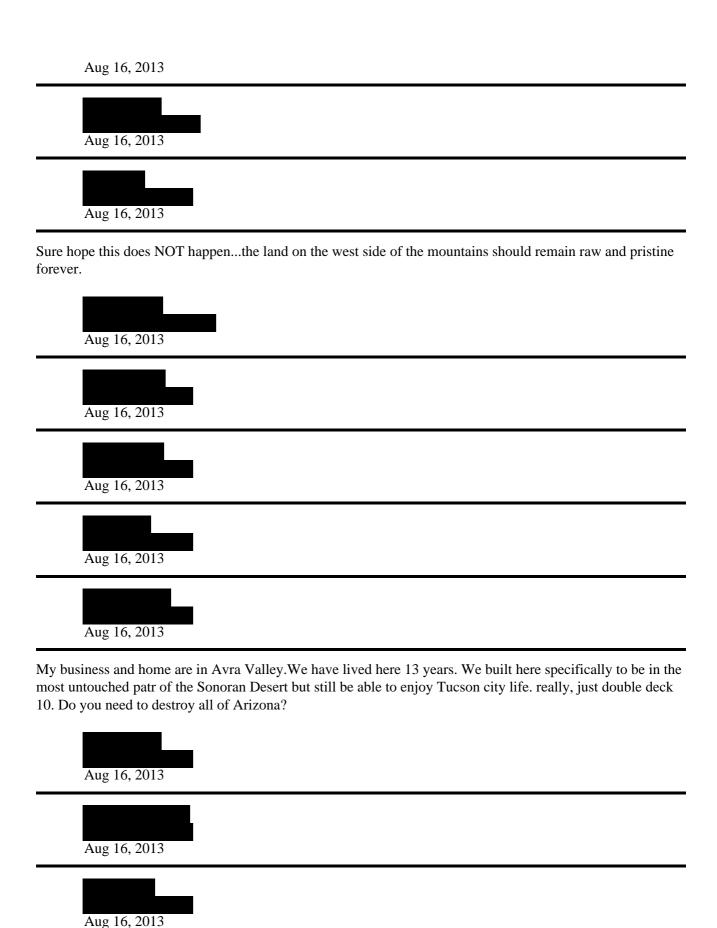




Not only would this highway likely result the destruction of the area's natural and archeological resources, it would have a negative economic impact on the Tucson area.

https://www.nps.gov/resources/2016.htm?id=7C4D0AC8-1DD8-B71B-0B5A929B483E2ADF Saguaro National Park visitors last year pumped \$66.5 million into our economy while supporting 691 jobs. Visitors come for it's beauty and sense of wilderness. A freeway would ruin the viewshed and the quiet peacefulness that attracts tourism. The Arizona-Sonora Desert Museum would be equally impacted, along with Ironwood Forest National Monument. In addition, the highway would have other obstacles such as the Tohono O'odham Nation's farmland, the CAP Canal, the CAP Mitigation Wildlife Corridor, Kitt Peak's dark skies, and numerous family homes and small businesses. The quiet rural lifestyle of the area would be forever altered. Businesses in Tucson would lose business if traffic is diverted away from the city. The drawbacks greatly outweigh the benefits.





## THE DUNBAR COMPANY LTD.

May 19,2017

Jay Van Echo -

I met you at the Buckeye
I-11 meeting last Wendsday
exening. I have never been
to a better presentation
then to the one you gave.
You are really good, and have
an in pressive team.

Que DIOS los Bendiga.

# INTERSTATE 11

# THE INTERSTATE 11 COALITION

June 2, 2017

### To Whom It May Concern:

On behalf of The Interstate 11 Coalition, I wish to express our thanks to the entire ADOT team, led by Jay Van Echo, who are working on the Tier One EIS Study. We appreciate your professionalism and commitment to this important effort.

Concerning the proposed routes currently under consideration, we have one comment to submit during this public comment period.

Wherever appropriate, we urge you to adopt those prospective routes which follow the previously approved Hassyampa Freeway Corridor as outlined in the Hidden Valley Framework Study prepared by the Maricopa Association of Governments, (MAG). This proposed alignment is also referred to by the local governments in Pinal County as the West Pinal Corridor.

This alignment was completed after numerous public hearings, environmental considerations, consultation with local governments and great expense.

In forecasting population and employment growth, local governments have incorporated this route into their approved general plans and local landowners have included this corridor in their land use plans and annexation agreements. This route will, therefore, provide much needed access to the region's future economic activity centers.

Additionally, this alternative best meets the need for system linkages and regional interstate mobility. The Hassyampa Freeway Corridor will best provide for future growth, transportation and the economic needs of the region by:

Providing a high-priority, access-controlled, north-south transportation corridor.

Supporting improved regional mobility for people, goods, and homeland security.

Connecting major metropolitan areas and markets with Mexico and Canada.

Enhancing access to the high-capacity transportation network to support economic vitality.

Again, thanks for keeping this process moving forward. We pledge our continued efforts to monitor and encourage the process to make Interstate 11 a reality as quickly as possible. Please let me know how you feel we can best assist.



Executive Director The Interstate 11 Coalition

TICSON, ARIZONA PINNERE, ARIZONA MERICALI, HAJA CALIFORNIA

100 N. Simm Ave. Surre 400 Themes, Astrona 85701 on 520-290-0823 nat 520-290-0969

June 1, 2017

Mr. Aryan Lirange Senior Urban Engineer Federal Highway Administration 4000 North Central Ave. Suite 1500 Phoenix, AZ 85012

The Sonoran Institute appreciates the opportunity to provide comments to the Federal Highway Administration (FHWA) and the Arizona Department of Transporting (ADOT) on the corridor options being developed as part of the Tier I environmental study for the proposed Interstate 11 (I-11) Corridor between Nogales and Wickenburg. Our comments are as follows:

### Revise the Purpose and Need Statement

The stated purpose of the I-11 corridor is to provide a "high priority, high capacity, and access controlled transportation corridor" (Purpose and Need Memorandum February 2017). The memorandum continues to state that the I-11 corridor is needed to provide a north and south transportation corridor that will connect important metropolitan areas and markets in the Intermountain West and to support improved regional mobility to people and freight. In the in the I-11 Intermountain West Corridor Justification Report (2013), the vision that I-11 could be a corridor which functioned as a multi-use corridor and establish multi-modal connections and linkages was supported by project stakeholders. This is also reflected in the vison statement of the Corridor Study Concept Study (2014):

"Effective inclusion of multimodal infrastructure elements, such as natural resources, power, telecommunication, freight rail, and potentially passenger rail, serve as the foundation of a stronger and more diversified economy for the Western U.S. The I-11 and Intermountain West Corridor will become a major, multimodal, north-south, transcontinental corridor through the Intermountain West."

With this in mind, we ask that ADOT revise the purpose and need statement to be more explicit about multimodal and multi-use as a fundamental purpose for the proposed I-11 Corridor. The inclusion of these components reflects what citizens and stakeholders foresee as needed in this corridor. Broadening the purpose and need from an access controlled north south transportation corridor to a multimodal and multiuse infrastructure and transportation corridor would more realistically reflect the purpose and needs of the *future* I-11 corridor.

The Sonoran Institute has conducted an analysis of the I-11 Corridor that attempts to provide clarity around the importance of embracing a true "multimodal" smart corridor that encompasses highway, rail, utility, data, and other infrastructure in a manner that allows for adaptability and change over time.

The Sonoran Institute recognizes the challenge of achieving a balance between economic growth and the preservation of Arizona's unique natural resources and identity—we feel that the view that one must be selected over the other is a false choice.



In September 2013, the Sonoran Institute, as part of the Arizona Solar Working Group performed an initial evaluation of the I-11 corridor through GIS analysis which included consideration of conflicts to Areas of Critical Environmental Concern (ACECs), Sonoran desert tortoise habitat, wilderness areas, citizen proposed wilderness, Arizona State Land Department (ASLD) lands with conservation value, riparian zones, Visual Resource Management (VRM) Classes, and REDA lands. In addition, SI embarked on a three-day field tour for a first-hand look at the I-11 alternatives extending from Phoenix to Nevada while meeting with local stakeholders along the way. This preliminary evaluation seemed to provide enough information to demonstrate that the I-11, at least through this alignment, could be accomplished with limited and potentially mitigatable environmental impacts.

The analysis and findings can be found in our <u>Proposed Interstate 11 Analysis: Casa Grande to the Mike O'Callaghan-Pat Tillman Memorial Bridge</u> (2014) report, where we addressed the following aspects of the I-11 corridor planning process:

- The value of utilizing the corridor as a catalyst toward increased renewable energy development.
- Environmental, cultural, and social features that should be avoided when determining corridor Alignments.
- A relative qualitative scoring of which alignment segments seem to be better sited or have lower conflict with known resource constraints. Refer to this report for more information.

We are concerned that the project's transition to a "highway first" approach continues to ignore the notable cost savings, economic and social benefits that a truly integrated planning and design approach will bring:

### 1. Community benefits:

Interstate corridors should be malleable to a range of future conditions. Currently highways stand as barriers between communities due to their ridged structure and narrow purpose. I-11 should anticipate the potential of urban communities springing up around the corridor, requiring integrated pedestrian and transit needs along with a range of perpendicular crossings.

### 2. Energy:

The I-11 corridor has already been identified as an important future connectivity need for energy movement. Alternative energy corridors that could be used to connect the Palo Verde substation to the Nevada substation in southern are identified as Corridors (http://corridoreis.anl.gov/maps/data/Priority Region 1.pdf?1) and may not be suitable for expanded energy infrastructure in the future. Alternative corridors are expected to be necessary in the future, particularly in light of work that has been done by the Sonoran Institute and the Arizona Solar Working Group to examine scenarios for future development potential in the area. The Arizona Solar Energy Buildout Study that published in 2015 was provides some important context. (https://sonoraninstitute.org/resource/arizona-renewable-energy-build-out-study-11-17-2015/)

### 3. Reasonably foreseeable future needs:

Recent advances in transportation technology raises serious questions about the form that future transportation may take. Self-driving cars are now a reality which will affect how highways should be constructed and planned. For example, the standard practice of constructing wide medians between opposing traffic directions may be unnecessary in the very near future as cars begin to safely operate in closer proximity and use congestion-based lane assignment. This approach could significantly reduce the overall cost of construction with the need of fewer overall lanes within the highway without affecting the level of service.

Other technology is advancing rapidly, including high speed multimodal options like the Hyperloop that would also need right-of-way to connect major urban centers. Though it is likely too early to plan the future integration of this infrastructure with the I-11, the corridor should anticipate the need for additional mass-transit modes that could operate within close proximity of the highway and have a limited additional environmental impact.



### 4. Heavy rail:

The 2017 Purpose and Need Memorandum acknowledges that while rail facilities are not being considered in the Tier I EIS, coordination is encouraged "...to ensure that a multimodal facility (i.e., rail and utility) is not precluded in the future, to the maximum extent feasible" (p. 14). Though we realize that other studies are ongoing that will inform the need for future rail corridors, the alignment for the I-11 should consider the possibility of this mode and accommodate it as much as possible.

### Revisions to Information on Recreational Resources

Please consider revising all maps which indicate Vulture Mountain Recreation Area (VMRA) as "proposed" and instead insert "pending". The leasing and Recreation and Public Purpose agreement with the BLM was finalized In November 2016 and the Maricopa County Board of Supervisors approved it in January 2017. The transfer will be completed in late Summer 2017 with the BLM's approval of the Environmental Assessment and the subsequent Record of Decision. Please also include the Hassayampa River Preserve as part of the Vulture Mountain Recreation Area. The 770-acre preserve was transferred over the Maricopa County Parks Department in March 2017 from the Nature Conservancy. GIS shape files are readily available from the Maricopa County Parks and Recreation Department to ensure that the preserve is included and accurately depicted on future maps for the Tier 1 EIS.

### Impacts to Sonoran Desert Heritage Proposal

For over a decade, a wide variety of conservation interests, recreationists, and community leaders have been working to advance a pragmatic effort to protect federal lands managed by the Bureau of Land Management west of Phoenix. This project became known as the Sonoran Desert Heritage (SDH) conservation plan and was introduced into congress in 2013 and 2015. The proposal covers areas that could be impacted by the I-11. A map can be found here: <a href="http://sonoranheritage.org/">http://sonoranheritage.org/</a>.

The creators of the conservation plan anticipated the coming of the I-11 through certain sections and addressed potential conflicts through some creative legislative language that can be found here: https://www.govtrack.us/congress/bills/113/hr1799/text/ih.

In particular, the conservation strategy created a Special Management Area in Rainbow Valley that was designed to allow the future interstate provided that it addressed the need for continued wildlife connectivity. This area is known as a critically important linkage for passage of flora and fauna between the Sonoran Desert National Monument and the Estrella Mountains.

Other alternatives may impact the SDH plan in a more significant way and should be avoided and are presented in the sections below.

### General Comments on Corridor Options:

- All routes need to be refined further to reduce impacts on resources. In general, there are
  infrastructure projects that have already been developed in close proximity to the alignments that
  have not been studied. These include transmission lines, canals, roads, and other impacts and
  should be considered as locations for reduced impact on resources.
- The information does not reflect if the corridors options will minimize impact to both natural and cultural resources. It is unclear if cultural/archaeological resources been taken into account during analyses of alternatives. They don't appear to be given nor identified as one of the evaluation criteria.
- More information is needed on how the qualitative analysis was performed that graded various segments. In particular, it would be good to examine segments based upon their ability to facilitate future linear infrastructure siting, and their value in moving energy from generation centers to load centers.



- 4. The feasibility of collocated infrastructure should be considered as a measure for grading the merits of alternative segments. This study continues to frame the I-11 as a "highway first" project which does not recognize the input from stakeholders nor the interest of Congress in MAP 21. It could be that the selected corridor may be well suited for a highway but could bring no added benefit to other modes.
- 5. The corridor options should be defined through the lens of 2040 rather than today. What uses and needs will be in these areas? How does that inform how we are thinking about the location of the corridor?
- 6. The study is focused on avoiding impact but mitigation strategies should be brought into the dialogue as impacted areas are identified: All routes are contributing to habitat fragmentation—what are the mitigation goals? All routes destroy ephemeral washes—how will this impact be mitigated? This discussion can help to reduce concern from the public.

### Specific Comments on Corridors Options:

### North Section-

The Sonoran Institute recommends green Corridor Options "T" and Corridor Options "S" and "W" be avoided as they are not supported by residents of Wickenburg and the Town Council. This was determination was made through a community engagement project and design charrette which is described in the "Town of Wickenburg Context Sensitive Interstate and Infrastructure" report (https://tinyurl.com/Wickenburg-Report-I11-CSS). The report, its findings and recommendations were adopted by the Town Council on May 1, 2017.

- The Sonoran Institute through its work with the community and in the region, and pending further more detailed information on environmental impacts, supports a modified version of Corridor Option "U". Its location supports the concept of collocating an interstate within an existing infrastructure corridor (the BLM Multi-Use corridor) and is support by the Town of Wickenburg. This Corridor Option may require mitigation to accommodate known wildlife linkages and crossings. The location of this corridor would occur within the Vulture Mountain Recreational Area, a Section 4(f) resource, therefore further analysis would be required to study the benefits of colocation. Wickenburg residents were clear in their interest to locate I-11 as close as possible to the existing infrastructure in order to avoid impacts.
- The Corridor Option "S" and "T" appear to have a more significant impact on ephemeral washes and natural areas.
- Corridor Options "S" and "T" pass through the boundaries of the proposed National Conservation
  Area (NCA). The Sonoran Desert Heritage proposal has a lot of local support and any impacts to
  the NCA should be avoided if possible.
- The green Corridor Option "T" north of US60 should be eliminated from additional analysis. It does not have support from the community (referenced in the Town of Wickenburg Context Sensitive Interstate and Infrastructure" report) and its location this far west does not provide or support economic benefits to the community of Wickenburg. Additionally this alignment cuts through environmentally sensitive public lands within a proposed National Conservation Area.
- The "W" Corridor Option along the existing US 60/93 alignment south and east of Wickenburg would have significant impacts to private property and incur the destruction of existing (and often historic) structures, businesses and homes. This alignment would likely require the removal of a significant portion of downtown which could not be replaced or rebuilt, and would have irrevocable impacts to the heritage of the downtown area and could not be mitigated. The Tier 1 EIS would need to include and evaluate the means to retain access to existing businesses and homes along US 60.
- It is unknown what the implications will be to changing the entitlements for the developments in Sun Valley. These details and discussion should be disclosed in the Tier 1 EIS, so stakeholders can better evaluate the Corridor Option and its impact to future land planning and business development.
- Corridor Option "W" would have considerable environmental impacts due to its encroachment and impact to the Hassayampa River and related riparian areas and wildlife corridors. The



route along US 60 "W" presents a range of issues that must be addressed before this alignment can be considered feasible.

#### Central Section

Pending further analysis, the Sonoran Institute supports Corridor Option "H", "K", "Q1" and "Q2" as they limit environmental impacts. These Corridor Options use existing transportation corridors and could optimize the corridor for multiple uses including energy transmission and freight. These alignments integrate freight, employment and industrial development plans into regional transportation planning. The analysis which supports these recommendations is supported in the previously referenced report "Proposed Interstate 11 Analysis: Casa Grande to the Mike O'Callaghan-Pat Tillman Memorial Bridge (2014).

- The Sonoran Institute recommends further analysis of Corridor Options "L" "M" to determine the degree of impact to a range of concerns. These Corridor Options run parallel to the Sonoran Desert National Monument (SDNM) and might give rise to conflict or concern. This segment would interrupt wildlife connectivity across the Rainbow Valley linkages, which is a high priority wildlife corridor. The corridor is also adjacent to Category 1 and 2 Sonoran desert tortoise habitat. These would be visual impacts to the viewshed of the Sierra Estrella Wilderness area. All of these issues would need to be addressed in the Tier One EIS.
- The Rainbow Valley (Hidden Valley) Corridor Option "L" presents a range of environmental challenges that can be avoided by using Interstate 8 and SR-85. More attention should be focused on how to meet the needs on existing infrastructure in this area. The Sonoran Desert Heritage conservation plan anticipated the potential of this corridor and has accommodated it through legislative language.
- It is suggested that Corridor Option "L" should be refined to multiple alternatives within the 2000 ft. wide corridor. One of which needs to be adjacent to the existing transmission infrastructure as much as practicable.

#### South Section

- Within this section existing transportation corridors (Corridor Options "A", "B", "G") should be given priority over new Corridor Options. This would help minimize further impacts and could potentially improve conditions along the existing corridor as part of the process.
- Further analysis could be done to identify priority and high value riparian areas. For example, recent mapping and research efforts have identified the Santa Cruz Flats as an area with biological/cultural value. Routes E and F would impact areas determined to be of high value for raptors utilizing riparian areas along the Santa Cruz River. Additional research in this area is needed to best minimize impacts if route G is not the selected route through this region.
- The Avra Valley routes (Corridor Options "C" and "D") should be refined into multiple alternatives that attempt to locate the corridor near to existing infrastructure. Though the mitigation corridor is a Section 4(f) property, it should be studied to determine if the lowest impact opportunity may be located within it, for example, on the downstream side of the CAP canal where wildlife passage over existing siphons can continue through a land bridge over the highway.
- The addition of alternative routes west of Picacho Peak (Corridor Options "E" and "F") needs to be
  justified. What factors are contributing to the need for a second interstate less than 10 miles from
  Interstate 10? This route has the potential to impact the Santa Cruz Flats which are ecologically
  important grasslands. Additionally, it will establish a greater barrier for wildlife connectivity.
- All Corridor Option in this section need to address and minimize impacts to 100-year flood plains, as Corridor Options "C", "D", "E", "F" go through areas mapped with 100-year flood plains. The Tier 1 EIS should include an overview of the impacts this corridor would have on water quality and quantity (and to Waters of the United States). Additionally, these types of potential impacts need to disclose the need for mitigation and likely strategies.
- Corridor Options "C" and "D" would need to provide adequate wildlife connections as they go
  through areas that are currently more rural and less impacted by major roads/interstate corridors
  than route "B".



- The Tier I would need to address how wildlife connections would be improved along Corridor Options "A" and "B" as part of the I 11 process.
- The section of Corridor Option "C", south of Sierrita Mountains, should be eliminated as it would cross an area that has little to no existing infrastructure and would create greater impact than benefits to the natural resources in the area. This is an area which has been identified by Pima County as an important biclogical area and has considerable ecological value. A corridor in this location does not bring added value to the area nor does it improve regional mobility to people and freight without sacrificing significant natural resources.

#### Recommendations for Mitigation Strategy

As the build out time period for Tier 2 Studies is estimated to be 10-20 years off, it is important to utilize a long term approach to coordinating mitigation strategies. The Corridor Options in the Tier 1 EIS should identify upfront the unavoidable offsite and onsite impacts. The Sonoran Institute recommends that the Tier I EIS include mitigation strategies to mitigate adverse impacts if the propose I-11 is built. This would include general mitigation strategies, mitigation banking, early mitigation, and developing partnering opportunities for mitigating cumulative impacts in the region. The identification of a mitigation strategy early in the Tier I EIS will provide a long-term vision and focus on coordination and will guide mitigation activities for the Tier 2 EIS to ensure that negative effects are minimized.

#### Design I-11 as a Resilient Infrastructure Corridor

As the design and construction of various segments of this corridor may occur 10-20 years into the future, it is recommended that the corridor be evaluated for its ability to be flexible in design. Choosing corridor options that met today's needs and requirement of communities and economic development and environmental conditions may result in a corridor that cannot be optimized and adapted for the future. All corridor options should be evaluated for their ability to be a resilient and adaptable infrastructure corridor. This includes ensuring that the corridor can physical designed to

- Accommodate future transportation modes and types (hyberloop, rail, bicycle, green energy facilities).
- Meet the needs of future communities that may transition from rural to urbanized due to growth associated with the new infrastructure/interstate facility in or adjacent to their community. This includes allowing for access to social infrastructure (education, healthcare, sports and recreation, fire and emergency services). This may mean reevaluating how all section of a corridor need to accommodate limited vs full access control.
- Adapt to future environmental limits and impacts (wind/dust storms, heat events, flooding, decreased ground permeability, habitat and wildlife fragmentation).

We look forward to maintaining a strong working relationship with FHWA as we continue to participate in the proposed 1-11 Corridor and we look forward to future coordination as we work to analyze alternatives and identify a corridor from Nogales and Wickenburg.

Sincerely,

Director, Sun Corridor Program
Cc via email: Rebecca Yedli

Rebecca Yedlin, Federal Highway Administration, Environmental Coordinator Jay Van Echo, Arizona Department of Transportation, Project Manager Lisa Ives, AECOM Consultant Team Project Manager



FORT !

Interstate 11 Tier One EIS Study Team c/o ADOT Communications 1655 W Jackson St. Mail Drop 126 F Phx, AZ 85071 May 24, 2017

To the Study Committee;

My name is I am a graphic artist who has lived in Picture Rocks since 1985; Tucson since 1975, and grew up just outside of Phoenix.

My parents moved to Phoenix in 1959 after my father graduated with his engineering degree from UC Berkeley. I was 5 years old. My parents were from California and Idaho, and like most Americans at the beginning of the 1960's they were not overly sophisticated, and were primarily concerned with obtaining a place near to my father's work and having an affordable home in which to raise their family.

The house they chose was built for them in a new subdivision called Village Meadows, located at the northeast quadrant of Bell Road and Black Canyon Highway (I-17). When my parents bought, they were assured that Phoenix was growing, and would soon grow out to their area. Phoenix grew at a breakneck speed throughout the 1960's, the 1970's, 1980's and beyond, yes, but it was not until the late '80's and into the new century that a real sense of a city environment developed around Village Meadows, long after I had left home.

Before I had even graduated from high school in 1972, however, I had realized how the Sonoran Desert works, in terms of general rainfall, temperature and vegetation patterns. Optimum conditions for the most diversity in flora and fauna are found on the gentle slopes of a bajada, near a low desert mountain range.

The building industry had recognized this fact, and began placing housing subdivisions in more lovely environments than out in the flats. Consequently, Phoenix grew eastward through the Tempe and Scottsdale areas long before it finally and in earnest grew northward along the I-17 corridor northward from, say, Northern Avenue.

I understood this dynamic well by the time I arrived in Tucson in 1975.

About two years ago the Tucson Mountain Park erected a plaque commemorating a man named Brown, for whom a mountain is named. Brown Mountain is situated between Old Tucson and the Sonoran Desert Museum, just west of Kinney Road. I had always thought the name described the color of the rock, which is brown. So I only learned the story of Brown recently (I would give his first name, but I am at home typing this and do not have the time to travel out to consult the sign for details). Mr. Brown moved to Tucson early in the 20<sup>th</sup> Century, and was taken by the natural beauty of the area. He apparently was a man of influence, and he was able to convince various landowners in the Tucson Mountain area that it would be in their best interests, and also in the interest of posterity to sell their land to the County for the purpose of creating a park. That park, Tucson Mountain Park, was formed, and later the northern half was transferred to the jurisdiction of the National Parks Service to eventually become Saguaro National Park, West Unit.

That is the kind of man we need today.

When I look at the proposed route of this I-11, I find it unconscionable that anyone would propose destroying the area around the Sierritas (I cannot tell from my map, attributed the Arizona Daily Star, 6-30-13 whether the route travels south and west of the range or lies along the northern slopes of the Sierritas). Either way is a disaster.

I will close with a quote and an added comment. Selectively quoting from a note penned by Melissa R. Trenchik, Environmental Quality Chief for the Saguaro National Park (7-11-16), and reprinted in a brochure published by the Avra Valley Coalition:

Viewsheds! Did Ms. Trenchik coin this word? I have never heard it, but I instantly understood its meaning. I am a photographer and painter, and have gratefully utilized, enjoyed and learned from the working ecology of the Tucson Mountain area for 40 years. One of the things I have most enjoyed the most are the great views across the Avra Valley from the eastern to the western chain of mountains defining it. These views are particularly lovely during the monsoon rains, when one can see distant rainfall events, often in the late afternoon and with the sun shining through as it begins to set over the O'odham Reservation.

As boy I was constantly being shuttled to school and church and shopping along the I-17 from Village Meadows into Phoenix proper, and this gave me daily opportunity to observe and muse upon the changing Phoenix-area views. I understood by the time I graduated from high school that these long, peaceful views, untroubled by the relentless Arizona development machine were the most vulnerable. One can enjoy a peaceful retreat in a park near the top of a bajada where the land grades into the rocky slopes of the parent mountain. One can look or point one's camera toward such a slope, giving a feel of wilderness to one's picture, and that is a wonderful thing. Such opportunity had been given to me by those far-sighted and generous people who sold their land to form the Tucson Mountain Park area.

But there are also the *viewsheds* mentioned by Ms. Trenchik, those long vistas, tens of miles long, distance filled with atmosphere, where you can see time as well as space; the long, clean line of the bajada surrounding the northern aspect of the Sierritas, a large-scale geological feature produced by specific geological and meteorological forces over long periods of time; or views more westward toward Kitt Peak (see the solar telescope?) and northward to what is now Ironwood National Monument. These are priceless. They are big. They are wonderful. They deserve to be handed down to future generations just like the Tucson Mountain Park system was so bequeathed.

This land needs to be cared for. The ancient term *animal husbandry*, like agriculture, but more descriptive of the reciprocal nature of deriving our life from the earth, needs to be applied here. Yes, people should live in the Avra Valley. But it should be treated as the precious, finite resource it is, a resource we can be proud to hand onto future generations who can draw strength from it.

Do not allow this travesty of a road to be built for the furthering of the ultimately short-term and unwise economic goals which are argued for in other quarters. My letter cannot address these complex issues except to here assert that I know of these concerns, I know of the need for good, sweaty jobs for our young people and more. I am not a 'bleeding heart liberal,' even though my identification of myself as a graphic artist might lead one to dismiss my arguments out of hand. Please consider the gravity of the decisions that are in your hands.



# To: Arizona Department of Transportation Re: Interstate 11 (I-11) Corridor Study Comments

Dear Interstate 11 Tier 1 EIS Study Team,

I am a conservation biologist who has lived and worked in Tucson for 25 years. For the last 18 years my research has focused on the population genetics of desert tortoise and other, local reptiles and I share my comments with you from the perspective of someone who has an intimate knowledge of landscape connectivity across the desert southwest.

In my review of the proposed alternative actions for the Interstate 11 Corridor, I favor options that colocate with existing transportation facilities. Specifically, in the South Section I am opposed to Corridor Alternatives C & D which will negatively impact Saguaro National Park and Ironwood Forest National Monument. I favor A, B & G which follow existing routes. In the Central Section, I favor alternatives H, K & Q as opposed to building new roadways such as with alternatives J, O & P. In the Northern Section, although there is an existing roadway along highways 60 and 93, these already bisect an environmentally sensitive area. Although options S and T are considered better in meeting the criteria for sensitive environmental resources, unfortunately, they would require new infrastructure which bring with them new development, branching roads, and more traffic.

While an important part of our nation's infrastructure, roads unfortunately have a number of negative impacts on our environment; sound pollution, light pollution, air pollution, scenic views and of course direct and indirect impacts on wildlife. In addition to direct mortality, roads result in habitat fragmentation which impacts the long-term sustainability of wildlife populations. Many of the reptile species that I work most closely with, such as desert tortoise (*Gopherus morafkai*), Gila Monster (*Heloderma suspectum*) and chuckwalla (*Sauromalus atar*) are distributed across the landscape in small, disjunct patches and for which the immigration of individuals among populations is critical for the long-term maintenance of populations (through "gene flow"; the movement of individuals, and/or the genetic material they carry, from one population to another). In my population genetic study of desert tortoises in southern Arizona that was published in the journal of *Conservation Biology* in 2004, I observed that anthropogenic barriers obstruct movements of tortoises between populations and disturb patterns of gene flow. Out of the nine populations included in my study, all but two population pairs currently have human barriers that seriously obstruct natural tortoise movements.

Habitat fragmentation through the construction of roads results in smaller populations with limited to no gene flow. Smaller populations are then more susceptible to other habitat disturbances and are negatively affected genetically through increased inbreeding and a reduction in heterozygosity, each of which can result in further reductions in population size. This negative feedback loop is referred to as an "extinction vortex". Each new road that causes further habitat fragmentation and degradation is another step toward this negative cycle. In a recent study I contributed to on Gila Monsters, we

observed that the robust population of this species that remains protected in Saguaro National Park benefits from landscape connectivity without major impacts from roads.

I purposefully focus here on the smaller fauna of the desert, although it is well documented that Puma, Bighorn Sheep, Pronghorn and other mega fauna are equally as impacted by habitat fragmentation and roads. The fact that so many species face the same issues is an indication that the negative effect of roads impacts the entire ecosystem. Where roads already exist we can document this impact. Where roads do not exist or are less traveled, we should try to preserve wildlife corridors and connectivity throughout landscape. In the context of the proposed corridor through Avra Valley (alternatives C & D), this is a biologically-rich part of our region with significant protected open space, wildlife linkages, and mitigation lands. Avra Valley is located between Pima County's Tucson Mountain Park and Saguaro National Park to the east and Ironwood Forest National Monument and the Tohono O'odham Nation to the west. It also contains mitigation lands managed by the Bureau of Reclamation for impacts from the Central Arizona Project canal, open space lands owned by Pima County and the Regional Flood Control District, and the Santa Cruz River. A new interstate through or adjacent to these protected lands would be devastating and irreversible.

If there is a proven need for expanded capacity of highway traffic, making improvements to the existing Interstate 10 corridor is the best alternative to manage increased traffic volumes in southern Arizona. All transportation options also need to be investigated, including an expanded rail corridor between Tucson and Phoenix and multi-modal transportation solutions generally.

Please feel free to contact me for any follow-up questions.



#### References:

Farrar, V.S., T. Edwards and K.E. Bonine. 2017. Elusive does not always equal rare; genetic assessment of a protected Gila Monster (*Heloderma suspectum*) population in Saguaro National Park, Arizona. Amphibia-Reptilia, 38:1–14.

Edwards, T., C.R. Schwalbe, D.E. Swann and C.S. Goldberg. 2004. Implications of Anthropogenic Landscape Change on Inter-population Movements of the Desert Tortoise (*Gopherus agassizii*). Conservation Genetics 5:485–499.



The Nature Conservancy in Arizona Phoenix Conservation Center 7600 N. 15th Street, Suite 100 Phoenix, AZ 85020-4330 Tel (602) 712-0048 Fax (602) 712-0059

June 1, 2017

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

To Whom it May Concern:

On behalf of The Nature Conservancy in Arizona, thank you for the opportunity to provide scoping comments on the *Interstate 11 Tier 1 Environmental Impact Statement (EIS)*. We commend ADOT for your efforts to seek stakeholder input in this important process and focus our comments on ways to effectively move forward with infrastructure planning while avoiding, minimizing and mitigating for impacts to natural resources.

We submit the following comments and recommendations on several options that ADOT identified for inclusion in the EIS. Our recommendations are based on input TNC provided on proposed routes, which are very similar to current EIS options, evaluated under the *Planning for Environmental Linkages* process in the *I-11 and Intermountain West Corridor Study,* completed in 2013. For that study, TNC completed a comprehensive, scientific analysis of proposed routes based on environmental sustainability criteria established in the *Planning for Environmental Linkages* process. In addition to the summary comments and recommendations below, in the attached appendices, we include more detailed information and recommendations for these routes.

- 1. TNC recommends that option "W" be removed from further consideration because an interstate would have significant impacts on the Hassayampa River and associated riparian areas (including Hassayampa River Preserve at Vulture Mountains Regional Park) that support significant wildlife populations, including threatened and endangered species. These impacts would be difficult or infeasible to offset with mitigation measures.
- 2. Options "I", "L", "M" and "N" would have significant impacts to wildlife that would need to be offset through minimization and mitigation measures, including structures to facilitate wildlife passage and enhance motorist safety. Construction of an interstate along these routes would bisect Rainbow Valley and, without mitigation measures, would likely isolate wildlife populations in the northern portion of the Sonoran Desert National Monument from habitat in the Buckeye Hills. In the Bureau of Land Management's "Regional Mitigation Strategy for the Arizona Solar Energy Zone Final Report" (<a href="http://blmsolar.anl.gov/sez/az/">http://blmsolar.anl.gov/sez/az/</a>), the Rainbow Valley was identified as one of the highest scoring candidate sites to mitigate for impacts to renewable energy development on lands designated by BLM as solar energy zones.



- 3. While options in southern Arizona were not fully evaluated in the 2013 Intermountain West Corridor study, we continue to have concerns about several of these options as described in our June 2016 letter to ADOT. The EIS alternatives should avoid areas that were acquired or identified for conservation and/or mitigation purposes. For example, in Pima County, these include lands identified or acquired for conservation as part of the County's Sonoran Desert Conservation Plan in the Altar and Avra valleys. These lands fulfill requirements under the Endangered Species Act section 10 permit recently issued by the Fish and Wildlife Service to the County.
- 4. Finally, we recommend that ADOT work with regulatory and land management agencies to develop and implement a comprehensive, programmatic, regional mitigation plan that would address impacts associated with the development of the interstate. The Fixing America's Surface Transportation Act, or FAST Act, which formally designated I-11 as a US Interstate, directs that agencies "shall give substantial weight" to these regional mitigation plans. Where developed in coordination with agencies in other states, these plans have substantially sped up the approval processes. Completion of such plans would enable ADOT to reach agreement in advance with a wide variety of stakeholders on areas suitable for maximizing multiple benefits and minimizing impacts to the natural resource values that contribute to Arizona's quality of life and economic health.

We would be happy to share data or direct you to specific sources of information that were used in these analyses. If you have questions regarding our recommendations or the background information, please do not hesitate to contact me. I can be reached at

Sincerely,

cc:

Joyce Francis, Habitat Branch Chief, Arizona Game & Fish Department R.J. Cardin, Director, Maricopa County Parks and Recreation Department

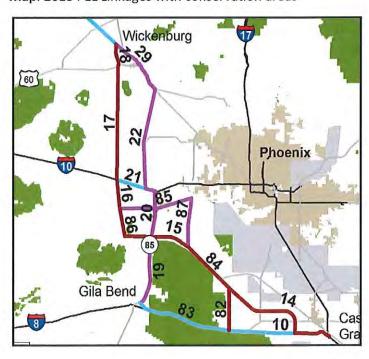
Appendix A. Summary table of potential environmental impacts found by The Nature Conservancy (TNC) in the Planning for Environmental Linkages (PEL) process conducted for the 2013 I-11 and Intermountain West Corridor Study. Green boxes indicate direct impacts found; cross-hatching indicates indirect impacts. Maps below shows 2017 Tier I EIS options (bottom left) and 2013 PEL segments (bottom right) for reference. Appendix B provided detailed narratives of impacts and mitigation measures for each specific option. Appendix C lists methods and data sources used to complete analyses.

#	I-11 EIS Option Letter	ESA Species	BLM Desert Tortoise Lands	Conservation Managed Area	Core/Limited Wildlife Habitat	Perennial Surface Waters	Riparian/Xero- Riparian Habitat	Sonoran Desert Habitat	Linkage/Unfrag. Habitat	Options to Offset
1	M (Segment 15 in 2013 PEL)		X				X	X		Minimize & Offset
2	L (Segment 84 in 2013 PEL)	X		$\times$						Minimize & Offset
3	I (Segment 14 in 2013 PEL)									Wildlife Linkages
4a	N (Segment 85 in 2013 PEL)	X		$\searrow$						Minimize & Offset
4b	N (Segment 87 in 2013 PEL)									Wildlife Linkages
5	W (Segment 29 in 2013 PEL)	X	<b>X</b>	$\times$	X	X	$\times$			Avoid
6	W (Segment 22 in 2013 PEL)							X		Avoid

Map: 2017 Tier 1 EIS Options



Map: 2013 PEL Linkages with conservation areas



**Appendix B.** Detailed descriptions of proposed I-11 options based on TNC analyses completed for 2013 I-11 and Intermountain West Corridor study.

1. Similar to option M (Segment 15 in 2013 PEL):

We recommend minimizing and offsetting impacts for this segment and also conducting studies to improve wildlife linkages.

The level of new construction required to establish an interstate along this segment could result in habitat loss or degradation to desert tortoise habitat and native habitat, in particular riparian, xero-riparian, and Sonoran Desert habitats. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy. Additionally, new construction would have the effect of isolating wildlife populations in the northern portion of the Sonoran Desert National Monument (i.e., north of I-8), from the critical native habitats in Buckeye Hills. The extent of this effect and options for restoring connectivity should be carefully studied.

Comparison: PEL segments 10, 83, & 19 have fewer impacts than 14, 82, 84, & 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.

2. Similar to option L (Segment 84 in 2014 PEL):

We recommend minimizing and offsetting impacts for this segment and also conducting studies to improve wildlife linkages.

The level of new construction required to establish an interstate along this segment could result in habitat loss or degradation to native habitat, in particular xero-riparian and Sonoran Desert habitats and to ESA Candidate species, Sonoran Desert Tortoise. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy. Construction of an interstate along this route would the effect of isolating wildlife populations in the northern portion of the Sonoran Desert National Monument (i.e., north of I-8), from the critical native habitats in Buckeye Hills. The extent of this effect and options for restoring connectivity should be carefully studied.

Comparison: PEL segments 10, 83, & 19 have fewer impacts than 14, 82, 84, & 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.

3. Similar to option I (Segment 14 in 2014 PEL):

Opportunity to study and improve wildlife linkages.

Comparison: PEL segments 10, 83, & 19 have fewer impacts than 14, 82, 84, & 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.

4. Similar to option N (Segments 85, 87 in 2013 PEL, comments for 85 shown):

We recommend minimizing and offsetting impacts for this segment, including conducting studies to improve wildlife linkages.

Habitat loss or degradation to ESA Endangered and Proposed Threatened species, Yuma Clapper Rail and Western Yellow-Billed Cuckoo, could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation.

5. Similar to northern portion of W (Segment 29 in 2013 PEL):

We recommend that the expansion of this segment should be avoided because direct and indirect impacts to the perennial waters and associated riparian areas that support important wildlife, including threatened and endangered species, cannot be adequately mitigated.

This segment traverses the groundwater basin supporting the Lower Hassayampa River near Wickenburg. The Water Resources Development Commission in 2011 found that water demand in the basin would exceed supplies by 2035 under a low-growth scenario. Given the current status of groundwater and surface flows in the Hassayampa basin, additional development and associated groundwater pumping facilitated by a new transportation corridor would increase impacts to wildlife and habitat above baseline conditions assessed by the WRDC. Given the rarity of perennial surface water, riparian habitat, and associated wildlife, it would be difficult if not infeasible to offset impacts through mitigation measures.

Additionally, habitat loss or degradation would likely occur to perennial surface waters (Hassayampa River) and riparian areas important for wildlife, notably ESA Endangered and Proposed Threatened species, Bonytail, Southwestern Willow Flycatcher, Western Yellow-billed Cuckoo, to ESA Candidate species Sonoran Desert Tortoise, to an area acquired and/or managed for conservation purposes (Hassayampa River Preserve), and to a genetically distinct and resilient population of Lowland Leopard Frog (Savage et al. 2011) could occur.

If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.

Comparison: PEL segments 17 & 18 have fewer impacts than 22 & 29. There are options to offset impacts to habitat resources in the 17/18 area, whereas impacts to rivers and riparian areas along the segment 29 route cannot be offset.

6. Similar to southern portion of W (Segment 22 in 2013 PEL):

We recommend that the construction of an interstate along this segment should be avoided because of the direct and indirect impacts to the resources in this area cannot adequately be mitigated. Habitat loss or degradation to ESA Candidate species, Sonoran Desert Tortoise, and to native habitat, in particular xero-riparian and Sonoran Desert habitats could occur.

If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.

Comparison: PEL segments 17 & 18 have fewer impacts than 22 & 29. There are options to offset impacts to habitat resources in the 17/18 area, whereas impacts to rivers and riparian areas along the segment 29 route would be difficult to offset.

#### **Appendix C:** Methods, Definitions and List of Source Datasets

Using the best available data for environmental sensitivity criteria (see list below), we quantified direct impacts within 1000 feet (500 foot buffer either side) of the proposed segments and indirect impacts within 2000 meters (1000 meter buffer either side, drawn beyond the direct impacts buffer). Following Council of Environmental Quality criteria<sup>1</sup>, we define direct effects/impacts as those "...that are caused by the action and occur at the same time and place", and indirect effects/impacts as those "...that are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable", including indirect effects on urban and suburban growth patterns. This distance of 1000 feet for direct impacts was chosen based on consultations with ADOT on the probable width that would be impacted with construction or other activities. We estimated indirect impacts within 2000 meters of the segment based on field research of threatened desert tortoises in the Mojave Desert<sup>2</sup> and a global analysis of birds<sup>3</sup> that indicate that these animals avoid or exhibit lower population densities within 1000 meters of roads. The effects zone for mammals has been measured to much larger distances<sup>3</sup> and we elected to evaluate this effect using data related to the fragmentation effect of road construction (i.e., linkages and unfragmented blocks). We note that these distances are preliminary and subject to change once more precise alignments are drawn. Their primary value is to offer a comparative analysis of the impact of segments relative to one another. To standardize our assessment, we evaluated all of these impacts in relation to the regional importance of the resource and the feasibility of offsetting impacts.

# Categories in Appendix A include:

- 1. Segments with opportunities to study and/or improve wildlife linkages
- 2. Segments with significant impacts to wildlife but where options to minimize and/or offset these impacts are feasible
- 3. Segments with significant impacts to wildlife that should be **avoided** because mitigation options are unlikely to offset impacts

In the cases where wildlife habitat loss would result in significant impacts, there are two potential assessments: (1) impacts may be offset through mitigation measures or (2) mitigation measures are unlikely to offset impacts. Significant impacts do not categorically rule out a particular alignment. It's the regional significance of the wildlife resources and the importance of the habitat for the long-term sustainability of wildlife populations that determines whether impacts can be offset. Given that our transportation system was not originally designed to facilitate movement patterns by wildlife, we also indicate which segments present an opportunity to improve wildlife passage over existing conditions. This assessment was made using data from the Arizona Game and Fish Department on wildlife linkages.

# List of Source Datasets

- ESA Species: Species with following statuses under Endangered Species Act: Endangered, Threatened, Candidate, or Proposed
  - a. USFWS Designated Critical Habitat; <a href="http://criticalhabitat.fws.gov/crithab/">http://criticalhabitat.fws.gov/crithab/</a>, latest update from USFWS, Feb, 2013
  - b. Heritage Data Management System, data requested from AGFD, Nov 2013
- 2) **BLM Desert Tortoise Lands**: Category 1 and 2 lands under BLM Desert Tortoise Mitigation Policy to avoid development or mitigate for losses.
  - a. Updated GIS data requested from BLM, Nov 2013
  - Tortoise habitat identified by BLM policy to avoid development or mitigate for losses; Final Report on "Compensation for the Desert Tortoise" Instructional Memorandum, 1991.
- 3) Areas managed for conservation purposes
  - a. Protected Areas Database v2 (PAD-US), Conservation Biology Institute; http://consbio.org/products/projects/pad-us-cbi-edition
- 4) Core wildlife habitat not represented or limited elsewhere in state
  - a. TNC Grasslands Assessment;
     <a href="http://azconservation.org/downloads/category/grassland">http://azconservation.org/downloads/category/grassland</a> assessment
  - b. TNC Habitat Conservation Priorities; TNC Ecoregional Assessments Roll-up, Dec. 2007; http://azconservation.org/downloads/category/ecoregional assessment
- 5) Perennial surface waters important to wildlife
  - a. TNC Freshwater Assessment;
     <a href="http://azconservation.org/downloads/category/freshwater">http://azconservation.org/downloads/category/freshwater</a> assessment
  - b. Groundwater basins connected to surface water flow; Anning, D.W., and Konieczki, A.D., 2005. Classification of Hydrogeologic Areas and Hydrogeologic Flow Systems in the Basin and Range Physiographic Province, Southwestern United States. U.S. Geological Survey Professional Paper #1702, 37p.
- 6) Relatively intact riparian and xero-riparian habitat: Identified for segments where majority of lands within direct impact buffer (1000 feet) are relatively intact (areal extent of human use <25%).
  - a. USGS ReGAP vegetation data, modified by AGFD for SWAP, 2010
  - b. TNC Human Use Intensity dataset, 2013
- Relatively intact Sonoran Desert Habitat: Identified for segments where majority of lands within direct impact buffer (1000 feet) are relatively intact (areal extent of human use <25%).</li>
  - a. USGS ReGAP vegetation data, modified by AGFD for SWAP, 2010
  - TNC Human Use Intensity dataset, 2013
- 8) Wildlife Corridor/Linkage or Unfragmented Habitat Block: Wildlife corridors are identified from sources (a-c) below. Unfragmented habitat blocks are contiguous blocks of native habitat with highest landscape integrity (areal extent of human use <5%) (TNC 2013).</p>
  - a. Arizona Missing Linkages (modeled); NAU Study 2007-2008
  - b. Detailed Linkage Designs (modeled); AGFD 2012

- c. County Level Linkage Assessments; AGFD, http://www.azgfd.gov/w\_c/conn\_whatGFDoing.shtml)
- d. TNC Human Use Intensity dataset, 2013

#### References

- <sup>1</sup>Council for Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR §§ 1500-1508.
- <sup>2</sup>Borman, WI and M Sazaki. 2006. A highway's road-effect zone for desert tortoises (Gopherus agassizii). Journal of Arid Environments 65: 94-101.
- <sup>3</sup>Benitez-Lopez A, R Alkemade, and PA Verweij. 2010. The impacts of roads and other infrastructure on mammal and bird populations: A meta-analysis. Biological Conservation 143: 1307-1316.

#### **I-11 Routing Comments**



#### Suggested Routing:

- o Run north to the east of the White Tank Mountain Regional Park (along 303 corridor).
- o In area of Deer Valley Road (north of Sun City West) turn west.
- Then turn north at the existing transmission line corridor west of Vulture Peak area.
   Follow this north to Hwy 60.
- o From Hwy 60 head roughly north to intercept the Hwy 93 / Hwy 71 intersection.

### Alternate Southern-End Routing:

- Run north on the west side of the White Tank Mountain Regional Park from I-10 (along alignment of the Sun Valley Parkway).
- Turn northwest following the existing transmission line corridor that parallels part of Aquila Road, crosses Vulture Mine Road, and heads north to the west of Vulture Peak area up to Hwy 60.

#### Alternate Northern-End Routing:

- o Run north to the east of the White Tank Mountain Regional Park (along 303 corridor).
- Between Wittman and Morristown, turn west following the existing transmission line corridor south of the Whispering Ranch area (roughly along the "West Dove Valley Road" alignment).
- Connect with the suggested alignment heading north.

#### Advantages:

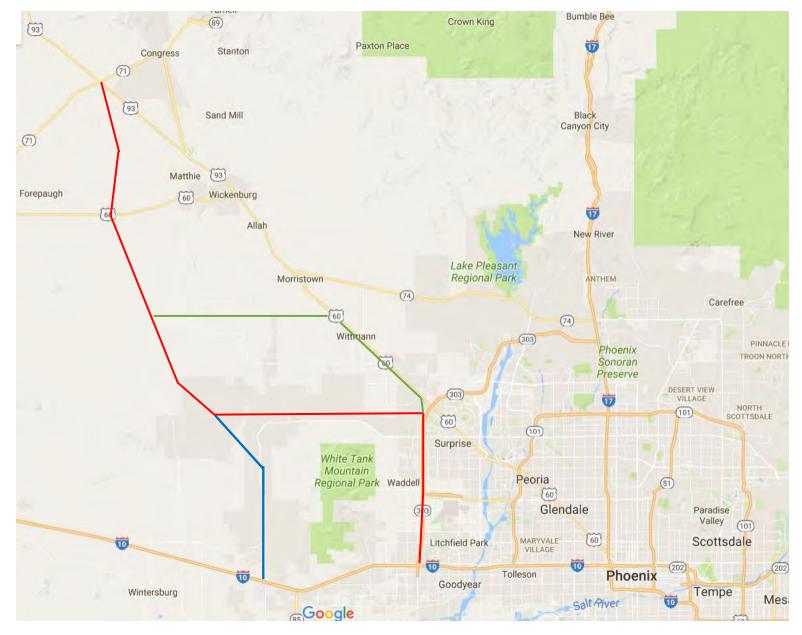
- Follows existing utility corridors avoids creating significant new impacts.
- Offers close proximity to the planned Forepaugh Industrial Rail Park (approx. 2.5 miles)
  - Access to BNSF and Arizona & California Railroad rail-lines
- Offers close proximity to Wickenburg Airport Industrial Park (approx. 8.5 miles)
- Offers access to the Wickenburg area from the southeast via Hwy 60, from the south via Vulture Mine Road, from the west via Hwy 60, and from the northwest via Hwy 93. This is accomplished without attempting to run an interstate through the Wickenburg historic townsite and established residential areas.
- Allows access to Hwy 89 north (Prescott) via Hwy 71 / Congress.
- Minimizes community impacts. The reason that people want to live in and visit Wickenburg is its laid-back, rural, western charm. Running an interstate highway right down the middle of the community would destroy the very essence of this community, and subject the residents to increased traffic and noise. Bypassing the historic corridor while allowing easy access as noted above enhances, rather than detracts from the community.
- Bypassing the existing Wickenburg area Highway 60 / Highway 93 corridor also avoids the
  expense and attendant disruption of purchasing and relocating residences, re-aligning
  streets, adding access ramps and frontage roads, relocating utilities.

# Phoenix to Wickenburg Area I-11 Routing

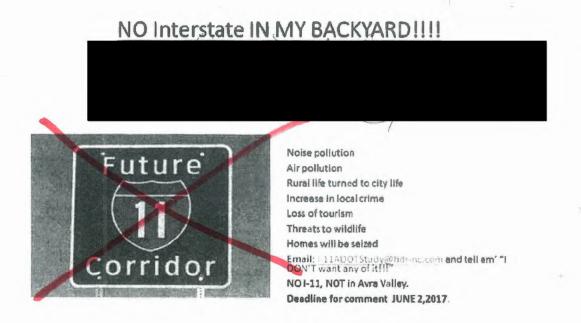
Red Line is the suggested routing.

Blue Line is the alternative southern-end routing.

Green Line is the alternative northern-end routing.



347 individuals submitted this form postcard during the comment period.



# Mail this to:

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

Phoenix, AZ 850071

185 individuals submitted this form postcard during the comment period.

I oppose any Interstate 11 routes through Avra Valley, including alternate routes C and D, due to negative social, environmental, and economic impacts on the communities of Picture Rocks and Avra Valley, as well as Saguaro National Park, Ironwood Forest National Monument, Tucson Mountain Park, and the Arizona-Sonora Desert Museum, among others. I support a no-build option since the existing I10/I19 corridor is sufficient for the economic needs of southern Arizona. If an expansion becomes necessary, I support option B to expand the current I10/I19 freeway corridor.



Please mail in this card with postage applied. You can also comment at 1-844-544-8049 or at: www.i11comment.com or i-11ADOTstudy@hdrinc.com

Make your comments before June 2, 2017!

Place Postage Here

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