

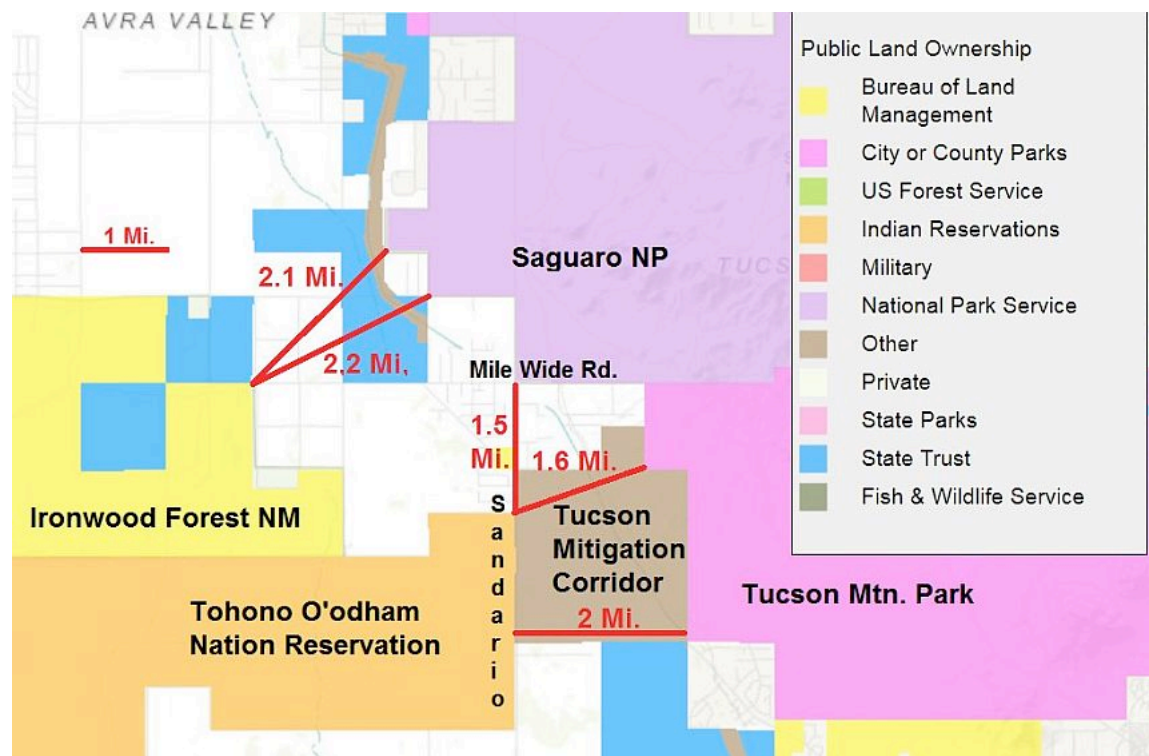
Comments on Corridor Alternatives for the Proposed Interstate 11 - Friends of Ironwood Forest, May 2017

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.