



## Coalition for Sonoran Desert Protection

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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."<sup>1</sup>

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>.

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<sup>1</sup> See <http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

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

## 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.”<sup>3</sup>

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 [HabiMap](#) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima County and FWS as “vulnerable” under the SDCP. Some of these species include, but are not limited to:

Aberts towhee  
Bell's vireo  
Western burrowing owl

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<sup>3</sup> [http://www.azgfd.gov/pdfs/w\\_c/partners\\_flight/APIF%20Conservation%20Plan.1999.Final.pdf](http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf)

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.

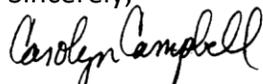
We also encourage a thorough evaluation of rail alternatives to accommodate future traffic increases and concerted coordination with other planning efforts such as Arizona's "State Rail Plan" completed in 2011.

**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 far-reaching 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.

Sincerely,  
  
Carolyn Campbell  
Director

Attachment: Pima County Resolution No. 2007-343

**RESOLUTION NO. 2007- 343**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

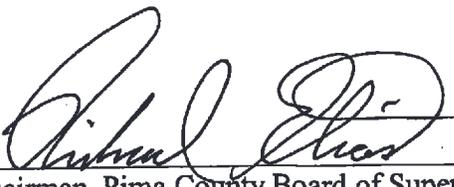
WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity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

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

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

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

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

  
\_\_\_\_\_  
Chairman, Pima County Board of Supervisors

ATTEST:

  
\_\_\_\_\_  
Clerk of the Board

APPROVED AS TO FORM:

  
\_\_\_\_\_  
Deputy County Attorney