



August 13, 2021

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

Subject: I-11 Final Tier 1 Environmental Impact Statement-Opposition To The
West Preferred Alternative Option

Dear Study Team:

The Tortolita Alliance (TA) is a local non-profit organization that advocates for the continued conservancy of the Tortolita Preserve and associated lands, ensuring protection of open space, wildlife habitat, watershed, and compatible recreational use.

Summary Statement

TA opposes the West Preferred Alternative Option (West Option) described in the Tier 1 Final Environmental Impact Statement (FEIS) for Interstate 11 (I-11). This route is located west of Tucson and bypasses Tucson through rural Altar and Avra Valleys, a landscape bordered by treasured and protected public lands and iconic tourist attractions that will be irreparably harmed by a nearby freeway.

We have previously requested (7/28/21 letter) an extension of the comment period from 30 days to 120 days and once again make that same request.

Detailed Comments

Impacts To Public Lands

The West Option is located perilously close to a wide array of public lands, including:

- Federal lands: Saguaro National Park West, Ironwood Forest National Monument, and the Tucson Mitigation Corridor (owned by the Bureau of Reclamation and managed by Pima County).
- County lands: Tucson Mountain Park and open space properties purchased and protected under Pima County's Sonoran Desert Conservation Plan and Section 10 Habitat Conservation Plan.
- Tribal lands: owned by the Pascua Yaqui Tribe and the Tohono O'odham Nation.

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Impacts To Wildlife Corridors

The West Option:

- Severs important wildlife corridors between the Tucson Mountains and Ironwood Forest National Monument and the Waterman Mountains.
- Directly crosses through the Tucson Wildlife Mitigation Corridor that was created as mitigation for impacts to wildlife corridors by the construction of the Central Arizona Project canal.
- In 2016, two desert bighorn sheep rams were photographed in numerous locations in the Tucson Mountains. It is highly likely that these rams used existing wildlife corridors between Ironwood Forest National Monument (where a herd of desert bighorn sheep exists) and the Tucson Mountains to travel to the southern section of the Tucson Mountains. These wildlife corridors would be fractured and fragmented forever by a new freeway.

Impacts To Noise, Air and Light Pollution

The West Option would:

- Cause significant noise, air, and light pollution, negatively impacting a wide variety of public and private lands, including a protected wilderness area in Saguaro National Park.
- Exponentially encourage urban sprawl west of the Tucson Mountains, destroying the rural character of this area.
- Negatively impact scientific research at Kitt Peak Observatory by increasing night lighting and compromising the ability of scientists to conduct their research.

Impacts To The Economy

The West Option, along with the entire proposed route from the border to Casa Grande would:

- Cause economic loss to Tucson by diverting traffic away from Tucson's downtown and growing business districts.
- Lead to negative economic impacts to tourism powerhouses such as the Arizona-Sonora Desert Museum and Saguaro National Park West, among many others.
- Lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other services.

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Impacts To Private Property

The West Option would:

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

Thank you for the opportunity to comment.

Regards,



Mark L. Johnson
President

ec: Carolyn Campbell, CSDP
Mayor Honea & Marana Town Council
Sharon Bronson, Chair Pima County Board of Supervisors
Mayor Regina Romero, City of Tucson
Governor Doug Ducey
Mark Finchem, Arizona House of Representatives
Vince Leach, Arizona Senate
Tom Halloran, US House of Representatives
Mark Kelly, US Senate
Krysten Sinema, US Senate