



Friends of Saguaro National Park

Providing financial and volunteer support for Saguaro National Park



July 26, 2021

Interstate II: Final Tier I Environmental Impact Statement Comments

Friends of Saguaro National Park (FOSNP) is an official not-for-profit fundraising partner of the National Park Service, created to help preserve, protect, and enhance the fragile environment and unique cultural heritage of the Sonoran Desert at Saguaro National Park. We help protect natural and cultural resources, preserve native landscapes, promote environmental education, improve recreational trails, enhance visitor experiences, strengthen community partnerships, and build environmental stewardship for Saguaro National Park through philanthropy, education, volunteerism, and public awareness.

FOSNP participated in the Stakeholder Engagement Meetings at the invitation of the Arizona Department of Transportation and the Federal Highway Administration in March and April of 2018.

FOSNP opposes the West Preferred Alternative Option in the Avra Valley of the I-II corridor from Nogales to Wickenburg. This corridor would:

Negatively impact thousands of acres of protected public lands including Saguaro National Park, Ironwood Forest National Monument, Tucson Mountain Park, and the Central Arizona Project's Tucson Mitigation corridor.

Cut through sensitive habitat recommend for protection by Pima County's Sonoran Desert Conservation Plan, sever critical wildlife movement corridors, block all animal migration from the Tucson Mountains to the west, disturb an unknown number of important archeological sites, impede washes, negatively impact surface water flows, and increase the spread of invasive plants.

Degrade the visitor experience at Saguaro National, which generates \$100 million in tourism. I-II in the Avra Valley would eliminate the natural quiet, destroying the scenic viewsheds, threatening the survival of native wildlife species and polluting the air in a national park that is afforded additional federal protections by the Wilderness Act of 1964.

Bisect the 2,514-acre Tucson Mitigation Corridor of the Bureau of Reclamation, nullifying the purpose for which it was preserved and would be contrary to the management guidelines that explicitly prohibit development on these lands.

Break Pima County's long-established and consistent public policies to preserve open space, protect wildlife habitat and movement corridors, and conserve the Sonoran Desert ecosystem by developing within the 1-mile Buffer Overlay Zone (Chapter 18.67, Pima County Town Code).

Be contrary to the purposes for which the Tucson Mountain District of Saguaro National Park was established in 1961, to protect these lands "unimpeded" for future generations to enjoy.

FOSNP believes that our community will experience economic benefits from increased trade between the United States and Mexico. To facilitate that goal, we support the East Preferred Alternative Option to co-locate I-11 on the existing transportation alignments (I-10 and I-19) by making improvements such as upgrades, expansions, and redesign. This will address the outlined I-11 project purpose, needs, and help to reconnect Tucson's downtown communities that were divided during the initial construction of I-10.

FOSNP opposes the West Preferred Alternative Option in the Avra Valley of the I-11 corridor from Nogales to Wickenburg based on the myriad of negative impacts with would have on Saguaro National Park and calls on the Arizona Department of Transportation and the Federal Highway Administration to drop all further consideration of this route in favor of the East Preferred Alternative Option that will co-locate I-11 on the existing transportation alignments through Tucson.