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January 9, 2008

Mr. Dale Buskirk
Transportation Planning Division Director
Arizona Department of Transportation
206 S. 17th Ave.
Phoenix, AZ 85007

Re: Proposed I-10 Phoenix/Tucson Bypass Freeway

Dear Mr. Buskirk:

Please accept these comments on behalf of the Sierra Club's Grand Canyon Chapter and our more than 14,000 members in Arizona. The Sierra Club has long been committed to protecting public lands, wildlife habitat, and ensuring that transportation and development accommodate the ecological considerations. We are strongly opposed to the proposed I-10 Bypass and the routes that have been suggested both in and around Tucson and in and around Phoenix.

First of all, we question the very premise of the proposed bypass. The idea that this bypass will relieve congestion in Phoenix and Tucson over the long term is just ludicrous. Roads and freeways drive development and in a relatively short period of time, the new freeways are just as congested as the current ones. City after city has discovered that they need to incorporate alternative forms of transportation into their planning. Los Angeles – and many other cities – has demonstrated clearly that building more freeways does not relieve traffic congestion.

The air quality implications of this proposed bypass for both Tucson and Phoenix are significant. Phoenix is already a non-attainment area for both particulates and ozone. Construction of a freeway in any of these route corridors would open them up to substantial new commercial and residential development far from existing urban centers, requiring and encouraging more car and truck travel. That means more vehicles traveling more miles resulting in more pollution. Tucson also has air quality challenges. It is difficult to see how this bypass would help with that.

With the significant implications of global warming and our need to reduce greenhouse gas emissions immediately, we should not be doing anything that would add to those greenhouse gas emissions. Cars and trucks are the second largest source of these emissions and as stated above, the bypass will just encourage more vehicles to travel more miles. The production of asphalt and concrete is also a significant contributor to greenhouse gas emissions.

All of the suggested routes for an I-10 bypass freeway would cut through pristine natural areas, which are habitat for hundreds of unique native species and movement corridors between habitat areas for dozens more. Some of these species are endangered or threatened already. The proposed routes would affect numerous protected areas including national monuments, national conservation

areas, and more. Areas such as the San Pedro are especially inappropriate for this project, but all of the suggested routes have enormous ecological costs and are unacceptable.

The economic costs of the project are also unacceptable. It is projected that the cost of the entire 250-mile project would be \$6 billion to \$8 billion and usually the cost of freeway projects far exceed the projections, so this would be a very costly project and suck up dollars that could be better utilized in developing a more balanced transportation system.

Rather than pursuing this ill-conceived bypass or waste any additional dollars on it, we ask that the Arizona Department of Transportation pursue building new train tracks in existing transportation corridors. The construction of rail tracks in existing transportation corridors would be more economical than buying the rights of way for and building new freeways, while providing for train travel that is cleaner and more efficient per passenger mile. This approach also would reduce polluting and global-warming car and truck travel in the busy I-10 corridor, eliminating a perceived need for either a bypass freeway or more lanes on the existing I-10. It would also accommodate increases in freight traffic.

For these reasons and many more, we ask that ADOT shift its focus and priorities to developing a plan to develop a rail option and to drop this I-10 Bypass proposal. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandy Bahr". The signature is written in a cursive, flowing style.

Sandy Bahr
Conservation Outreach Director
Sierra Club – Grand Canyon Chapter