



**New River/Desert Hills Community Association, Inc.**

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November 26, 2007

ADOT I-17 Alternate Study  
c/o Kristin Darr-Bornstein & Associates  
4545 E. Shea Blvd, Ste 108  
Phoenix, AZ 85021

Dear Kristin Darr:

On behalf of the New River/Desert Hills Community Association, Inc. (NR-DHCA), we submit this response regarding the Arizona Department of Transportation (ADOT) Interstate 17 (I-17) Alternatives Study. The New River/Desert Hills communities consist of an approximately 250 square mile rural area with over 10,000 residents (2000 Census figure). Many from our communities travel regularly to Prescott and Flagstaff.

Our analysis is attached and our conclusion is: While there will be a need for an alternate N/S freeway at some point in the future, we do not agree with or approve of the alternatives proposed in this study.

Our reasons for taking this position are:

- We do not think that there has been a realistic, factual study of the proposed alternatives involving the long-range impact on communities, recreation areas, wildlife corridors, habitat preservation, etc. While we understand and agree that there is a future need for an alternative N/S freeway, we would hope that there will be a more thought out, long-range impact analysis of the proposed alternatives.
- The current I-17 Widening Project is analyzing alternative routes along these same alignments; making this Alternative Study premature at best and conflicting at worst.
- There are other existing roadway alternatives available for emergencies and casual driving.
- Alternative "L" would decimate the Black Canyon Trail, which is an award-winning and world-class multi-use trail system.
- Alternative L would also negatively impact the communities of Black Canyon City and Cleator.
- Alternative "M" would destroy the quality of life in communities north of Carefree Highway, such as Cave Creek, Desert Hills, and New River. A similar route was taken out of consideration by the City of Phoenix years ago.
- "M" would also traverse straight through the Tonto National Forest severely impacting recreation and wildlife corridors throughout the area.
- Neither the M nor L alternatives would provide an emergency route - particularly in the case of wildfires or chemical spills - because of their close proximity to the I-17 corridor. In fact, the vectoring of invasive weed species along freeway corridors is a major contributing factor to the spread of wildfires.

Thank you for considering our viewpoints. Please keep us informed as to other opportunities to keep involved (meetings, future drafts, etc.)

Sincerely,

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Shareen Goodroad, President

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Terry Marron, Vice-President

C: Governor Janet Napolitano, US Senator Jon Kyl, US Senator John McCain, AZ State Senator Pamela Gorman, AZ State Representative Doug Clark, AZ State Representative Sam Crump, AZ State Representative John Nelson. BLM, Arizona State Director Elaine Zielinski, BLM Phoenix District Manager Teri Raml, Maricopa County Supervisor Andy Kunasek. ADOT Community Relations Project Manager Tim Tait

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**Analysis of Arizona Department of Transportation (ADOT)**  
**Interstate 17 (I-17) Alternatives Study.**  
**August 27, 2007**

We, the Board of Directors for the NR-DHCA, submit the following:

- 1) Analysis of ADOT’s proposal statement; and
- 2) Analysis of Alternatives L and M (the sections that directly affect our members).
- 3) Response to the flyer “I-17 Alternative Study” dated November 17, 2007

1) Analysis of ADOT’s proposal statement:

<b>ADOT Proposal Purpose and Need</b>	<b>NR-DHCA Comment</b>
Purpose: Evaluate the feasibility of providing alternate routes to I-17 that would meet future corridor travel demand requirements, enhance operational and safety conditions, and improve overall reliability of the corridor.	<p>Using existing corridors makes more sense – economically, environmentally, and socially. The transportation plan does not involve an efficient or effective use of resources.</p> <p>This plan is not sensitive to the human or natural environment. The diversity of the various impacted communities' visions are not fairly integrated into the transportation plan. When transportation planning reflects community input and takes into consideration the impacts on both human and natural environments, it also promotes partnerships that lead to "balanced" decision-making.</p> <p>We think the project should have begun with communities and regions articulating a vision for their future – not with a top-down review of ADOT created alternatives. The transportation plan does not give fair consideration to avoiding and/or minimizing disruption to the existing residents in the corridor communities.</p>
Need: Travel demand will continue to increase with Arizona’s rapid growth in population, employment, and business activity.	<p>True. However, we think the more logical approach would be to consider upgrading and/or expanding the existing corridors and roads.</p> <p>Additionally, the state could be doing a lot more to encourage alternatives to using the highways; such as mass transit, virtual meetings, car pooling, etc.</p>
Need: Travel demand on I-17 currently exceeds capacity south of the Anthem community, resulting in congestion and travel delays.	True. The widening of I-17 inside the current I-17 corridor will address this. When built, the Loop 303 will provide additional mitigation for this issue. There are also other corridor alternatives.
Need: Capacity will be exceeded elsewhere along I-17 as growth continues.	<p>True. The current I-17 Widening is addressing this.</p> <p>Adding more corridors would also impact air quality, destroy the viewshed, reduce/destroy popular recreational areas, increase the potential for animal-vehicle collisions, and increase the introduction and vectoring of invasive noxious weeds; which are a major contributing factor to the spread of wildfires.</p>
Need: Mountainous terrain and high truck volumes currently cause substantial delays from trucks slowing on grades.	<p>While true, the existing I-17 can and should be mitigated with the current widening project.</p> <p>The proposed routes have equal or worse terrain to traverse.</p>
Need: Delays associated with congestion and operational conditions degrade the day-to-day reliability of travel on I-17.	While true, the existing I-17 can and should be mitigated through widening and the addition of frontage roads.
Need: Crashes often close I-17 resulting in long, unpredictable travel delays.	Frontage roads are the only solution to providing off-highway emergency access to public services and drivers.

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ADOT Proposal Purpose and Need	NR-DHCA Comment
Need: No practical alternates exist for I-17 traffic between Flagstaff and Phoenix.	<p>Not exactly true. More importantly, there is not a clear need for an additional, new FREEWAY alternative.</p> <p>I-17 could handle Arizona’s north-south freeway needs well into the future. For example, in California there is only the I-5 out of Los Angeles. Oregon has only I-5 in the far west and a portion of 84 in the far eastern part of the state. Washington has only I-5 for a north-south route. New Mexico and Colorado have only I-25 for a north-south route.</p> <p>There are other existing N/S non-freeway corridors in the vicinity; such as 93 and 89 (west of I-17), and 87 (east of I-17), existing between Phoenix and Flagstaff. Going even farther east or west, there are other non-freeway corridors. These corridors can and should be considered before any additional new routes are constructed.</p>
Need: Travel delays and unreliability impose significant economic and quality of life costs on businesses, commuters, and recreational travelers.	True. However, the cost of building new corridors through rugged terrain would be enormous unnecessary tax burden on the citizens of Arizona.
Need: Travel delays and unreliability disrupt other transportation modes such as airport, bus, and train connections, and degrade response times for emergency service providers.	<p>True but there are other ways to address the problem.</p> <p>Providing frontage roads would address the response time and ease of access for emergency services.</p> <p>Furthermore, adding new additional routes only means there would have to be more routes for emergency services to cover, when there is not enough staff or resources to cover the current routes.</p>

2) Analysis of Alternatives L and M (the sections that most affect our members):

Alternative M and Alternative L

- The rugged terrain would involve inordinate expenses to build an unnecessary freeway.
- The alternative would worsen the air-quality issues in the valley during and after construction.
- It is not apparent that watershed management or viewshed qualities were considered, as the alternative would impair both. This would not only be to the detriment of the existing communities directly impacted, but also the state’s ability to attract tourists and other visitors.
- The maps should show the property owners designation correctly – particularly National Forest and Bureau of Land Management - so the public can truly evaluate the impact on their recreational activities.
- In the case of a wild fire (as in the 2005 Cave Creek Complex Fire), both alternatives and I-17 would be closed; it would be better to have more separation between emergency travel routes. A more westerly corridor (such as 74, 60, 93, and 89 west of I-17) or a more easterly corridor (such as 87 and Lake Mary Road east of I-17) would remain open in the event of a major catastrophe such as a wildfire or chemical spill.
- Both alternatives will require mitigating noise impacts through the construction of expensive noise barriers (blocking even more viewshed).
- North of New River, both alternatives have virtually no means to access the freeway in the event of a catastrophic event, which makes the freeway impassable for emergency vehicles and drivers alike.
- Both alternatives would create additional wildlife movement barriers (either by their existence or their fencing and sound barriers) to an area that is very sensitive (especially to the habitat of the native pronghorn antelope which is considered a species of concern by AZ Game & Fish).
- Both alternatives would increase the number of invasive plants and therefore further degrade the environment. The vectoring of noxious weed species is a major contributing factor to the introduction and spread of wildfires.

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- Both alternatives would increase the negative impacts (mainly destruction due to construction but also degradation due to increased access) of the archeological sites in the path of the new routes.

Alternative M – in addition to the above:

- Bringing a major freeway and the accompanying traffic would not be supportive of the 2020 Maricopa County New River Area Plan or the Carefree Highway Scenic Corridor Study.
- This alternative would also negatively impact Cave Creek due to the destruction of the viewshed, additional noise, additional air pollution, additional lights, etc.

Alternative L – in addition to the above:

- Bringing a major freeway and the accompanying traffic would be very disruptive to Black Canyon City, Cleator, and all the other small rural communities that the proposed route passes through or very close to.
- This alternative would practically destroy the historic Black Canyon Trail, which is a major nationally recognized and celebrated north-south recreational trail system.
- The analysis of L should include consideration for the Loop 303 extension that is proposed to connect with I-17 in the vicinity of the New River Interchange.

4) Response to the flyer “I-17 Alternative Study” dated November 17, 2007

- Under “Do you have any other comments?” there is a statement “Use New River Road as part of the corridor.” NR-DHCA believes this comment was in reference to the New River Road section that runs from the I-17 New River Interchange southwesterly to intersect with Route 74. This section has been slated in previous plans to be part of the 303 extension; we have no objections at this time to that plan. This relates to the last bullet under “Alternative L – in addition to the above”. **However, the “Use New River Road as part of the corridor” should NOT apply to not the portion of New River Road that runs from the I-17 New River Interchange to Carefree Highway.**