



August 14, 2023

The Honorable Pete Buttigieg  
Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

**Subject: Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation (PROTECT) Program grant application**

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is the leading 501c-3 non-profit organization in Arizona dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as providing educational opportunities for outdoor enthusiasts on issues important to their passions. AZSFWC consists of 39 member, affiliate, and associate groups that reach across the spectrum of conservation, hunting, angling, shooting, outdoor recreation, and businesses from across Arizona. Our member groups alone represent over 28,500 people from Arizona.

AZSFWC wishes to express our support of Arizona Department of Transportation's (ADOT's) request for a discretionary PROTECT Planning grant to reopen State Route (SR) 88. These grant funds will be used to advance resiliency in the planning for reopening this road. This approach will provide on-going benefits to the state and stakeholders by preserving the state of good repair of the reopened road. ADOT will benefit from the development of best practices which will improve the resiliency of the state highway system to withstand extreme weather events that are impacting our infrastructure more and more frequently.

In 2019, the 123,832-acre Woodbury Fire burned through the Superstition Mountains. Then on September 23, 2019, Tropical Storm Lorena pummeled the region with up to 6-inches of water. Extensive roadway damage occurred, and rock debris obstructed the roadway following this severe flooding event. As a result, a 5-mile, unpaved section of SR 88 (Apache Trail) from the Fish Creek Hill Overlook/Rest Area (milepost 222) to milepost 227 near Reavis Trailhead Road was closed for public safety reasons and remains so today.

SR 88 was constructed in the early 1900s to provide construction access from Mesa to the planned Theodore Roosevelt Dam. Upon the dam's completion, the route remained a popular tourist attraction for both motoring enthusiasts, and more importantly to AZSFWC, access to recreational destinations and activities beloved by Arizonans and visitors alike, such as Canyon Lake, Apache Lake, Theodore Roosevelt Lake, Tonto National Monument. It also provides access to a wealth of trailheads, scenic vistas, and shoreline areas in the Tonto National Forest.

AZSFWC Support for PROTECT Grant for Reopening AZ State Road 88 – 8-14-23

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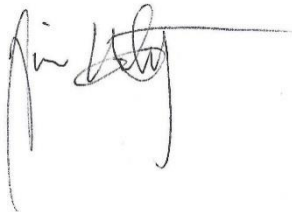
The route was designated as Arizona's first Historic Road and remains a scenic roadway to this day. The Arizona State Historic Preservation Office also recognized the route's significance through an Arizona State Register of Historic Places designation. However, as a result of the extensive damage to the roadway following the Woodbury Fire and Tropical Storm Lorena, this historic route remains inaccessible to the public.

The closed section of SR 88 has received extensive public support and media attention. Advocates for the route's reopening range from Apache Trail businesses to sportsmen and women, motorized access enthusiasts, and elected officials. While the diverse groups of supporters have been working alongside ADOT to build support for SR 88 improvements, additional funding is needed to bring the project to fruition.

PROTECT Planning grant funding will allow ADOT to incorporate resiliency improvements (such as upsized culverts, slope stabilization, and concrete barriers to retain flows and debris) into the final design of the SR 88 project. This will mitigate the negative impacts of increasingly common extreme weather events on the roadway, limiting closures for route users and lowering maintenance and repair costs for the route. PROTECT funding will also support NEPA and any other necessary environmental clearance processes to ensure that project improvements do not negatively impact the Superstition Wilderness Area, Tonto National Forest, the broader region, and associated communities.

AZSFWC and our member organizations appreciate your consideration of our comments!

Thank you!

A handwritten signature in black ink, appearing to read 'Jim Unmacht', with a long horizontal line extending to the right.

Jim Unmacht  
Executive Director