



DESERT TORTOISE COUNCIL

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5 July 2016

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

Re: Interstate 11 Corridor - Nogales to Wickenburg
(sent by email and hard copy by MH Fusari, member of the Ecosystem Advisory Committee)

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of these species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council regularly provides information to individuals, organizations and regulatory agencies on matters potentially affecting the desert tortoise within its geographic range.

We appreciate the opportunity to comment on the initial study of the proposed corridor for Interstate 11 (I-11) between Nogales and Wickenburg. We understand that the proposed corridor is between 5-25 miles wide, and that this comment period is to solicit input to form potential corridor alternatives and that those will include a no action alternative.

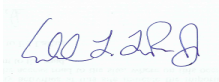
The Council asks to be informed as an interested party of all future material released on this project including the route between Nogales and Wickenburg as well as any northern extension of the I-11.

We understand that the Arizona Game and Fish Department (AGFD) has models and observational data on the Sonoran Desert Tortoise (*Gopherus morafkai*) within the corridor area. We attached the map obtained from AGFD, although we do not have access to the data behind the model or the set of observations depicted. How does your team intend to analyze the habitats, habitat linkages and occurrences of *G. morafkai* in the course of setting alternatives for the I-11?

We notice that the corridor shown in your current study includes several important protected lands and negotiated habitat linkages. We believe that it is important that I-11 not take any desert tortoise habitat or disrupt important linkages between known populations. The recent decision not to list the Sonoran Desert Tortoise as threatened or endangered under the Endangered Species Act was based on the assumption that populations are currently stable; any take might well reverse that situation.

Please keep us fully informed as this project moves forward.

Thank you for your time,

A handwritten signature in blue ink, appearing to read "E. LaRue, Jr.", enclosed within a light blue rectangular border.

Edward L., LaRue, Jr., M.S.

Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson