



DESERT TORTOISE COUNCIL

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6 July 2019

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

Via email only to: I-11ADOTStudy@hdrinc.com

Subject: Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg, Arizona.

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 desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats likely occupied by Morafka's desert tortoise (*Gopherus morafki*) (synonymous with "Sonoran desert tortoise"), our comments pertain to our concern regarding the proposal to place the planned I-11 freeway through the Avra Valley, west of Tucson, Arizona, instead of using the alternative of co-locating it along the already developed route of the I-10 freeway or using other methods to achieve the transportation goals desired.

For the reasons given herein, the Council formally opposes the development of the freeway through Avra Valley and recommends instead that the freeway coincide with the I-10 corridor.

Letters by the Tucson Herpetological Society and the Coalition for Sonoran Desert Protection, which the Council fully endorses, have well documented the many serious concerns, so our comments will be brief.

Desert tortoises are known to exist in the area of the proposed Avra Valley freeway and their movements, especially inter-population migrations and seasonal movements for feeding, will be impeded by the proposed new freeway. There will also be direct loss of viable habitat depending on the precise siting of the project.

We see from the DEIS that the planning team acknowledges that the Avra Valley alternative will cause far greater threat to populations of native species, including the desert tortoise, and will result in far more habitat degradation and most especially fragmentation of existing habitat than the alternative of co-location along the route of the current I-10 corridor. Although mitigation by constructing freeway crossings is proposed, our opinion is that no amount of mitigation can fully counter the effects of a freeway through habitat lands, most especially those already committed as mitigation for the Central Arizona Project, on habitat connectivity.

We appreciate this opportunity to provide input and ask that the Desert Tortoise Council be identified as an Affected Interest for this project, and that any subsequent environmental documentation for this particular project is provided to us at the contact information listed above.

Regards,

A handwritten signature in blue ink, appearing to read "E. LaRue, Jr.", is centered below the "Regards," text. The signature is written in a cursive style.

Edward L. LaRue, Jr., M.S.
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson