



DESERT TORTOISE COUNCIL

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Via email only

August 16, 2021

I-11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007
I11Study@azdot.gov

RE: I11 Tier 1 Environmental Impact Statement (EIS)

Dear I-11 Tier 1 EIS Study Team:

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 location of the proposed I-11 freeway. Given the location of the preferred alternative for a route through the Avra Valley, in habitats likely occupied by Sonoran Desert Tortoise (*Gopherus morafkai*) (synonymous with Morafka's desert tortoise), our comments focus on maintaining and enhancing protection of this species. We also consider the protection of other species (see list attached) and the overall habitat protection and protection of habitat linkages as vital to conservation in the Avra Valley.

In the EIS the Recommended Alternative is a route through the Avra Valley (Executive Summary figure ES-2). The other alternative described (in addition to a no action alternative) is to upgrade the existing transportation corridor along the I-19 and I-10 through Tucson.

Clearly the Avra Valley option has the greater potential to negatively impact both native habitats and species, including the Sonoran Desert Tortoise as well as the quality of life of residents living in the area, which is currently rural to semi-rural in nature. We consider the impact to native habitat and native species including the Sonora Desert Tortoise as unacceptable. Not only would the new freeway itself take away important habitat, but also the options to add more transportation elements, such as rail and utilities in the future. Locating a new interstate highway in the Avra Valley would also likely lead to residential and commercial development along this new transportation corridor, as has occurred at many other locations where a new interstate highway skirts an urban area. We are most concerned that a freeway, through currently intact habitat, natural open space, publicly owned natural open space, and privately owned natural open space, will not only eliminate a measurable amount of existing habitat but will also fragment populations and their habitats for most of the extant species, not only of amphibians and reptiles, but also mammals and invertebrates. Such effects are likely to result in multiple species population losses over large areas, and the overall degradation of species richness and biodiversity.

This preferred alternative route through the Avra Valley is following existing natural open spaces. This route, in the Avra Valley region, will result in taking existing native habitat lands while avoiding parcels that have already been partially urbanized. This configuration will diminish the value of the remaining highest quality lands as native species habitat. It will also inhibit successful restoration and ongoing natural ecosystem recovery and regeneration of the numerous and extensive retired agricultural parcels that already are providing habitat for numerous native species.

A special concern is the elimination of a previously agreed upon habitat connection passing through a parcel of Bureau of Reclamation land that was established as a mitigation corridor for the Central Arizona Project (CAP). This corridor includes potential habitat and annual migration behaviors of the Sonoran Desert Tortoise. We oppose the increased degradation of this parcel as it now exists as a corridor connecting the Tucson Mountain Park with other habitat lands in the Avra Valley and Ironwood Forest National Monument to the west. We realize that some disruption of it already exists. We also recognize that some mitigation can be provided by constructing overpasses and underpasses along a freeway. However even the best designed and deployed set of crossings cannot mitigate against the loss of connection for many species, especially those too small or local in their movements to travel or disperse over great distances. Only by allowing reasonably large and undisturbed, intact natural habitat to connect larger parcels can we say we have protected the sustainability of our native species and prevented many local extinctions that would result from increased fragmentation. We believe these needs may vastly exceed the scope of mitigation currently under consideration.

We ask that the current decision makers consider the use of alternative transportation systems, such as railroad transport, to move people and goods north and south through this area before deciding on a preferred alternative.

We support the alternative that provides the habitat protection and species sustainability offered by co-locating the I-11 along the Tucson corridor of the I-10.

We appreciate this opportunity to provide input and trust that our comments will help protect the Sonoran Desert Tortoise and other special status species during any authorized project activities. Herein, we ask that the Desert Tortoise Council continue to be identified as an Affected Interest for this and all other FHWA or ADOT projects that may affect the desert tortoises, and that any subsequent environmental documentation for this particular project is provided to us at the contact information listed above. We also ask that you acknowledge receipt of this letter as soon as possible so we can be sure the appropriate party has received our concerns.

Regards,

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

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

Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson

Attachment: Table 1. Amphibians and reptiles (herpetofauna, total of 52 species known) of Avra Valley (Robles Junction to Redrock Road), Pima and Pinal counties, Arizona.

Table 1. Amphibians and reptiles (herpetofauna, total of 52 species known) of Avra Valley (Robles Junction to Redrock Road), Pima and Pinal counties, Arizona. Coding of threats is: F = Habitat Fragmentation, M = direct road mortality, L-t F = long-term fragmentation of mountain habitat leading to genetic isolation based on small population sizes. Coding of current Status is: A = abundant, C = common, U = uncommon, R = rare, ((Mts) = primarily in desert mountain habitat, Ext = extinct in Avra Valley, NN = non-native.

Group (English Name)	Scientific Name	Threats from Proposed I-11	Current Status in Avra Valley	Urbanization Threats *
Lizards (17 species)				
Sonoran Spotted Whiptail	<i>Aspidoscelis sonorae</i>		U (Mts)	
Tiger (Western) Whiptail	<i>Aspidoscelis tigris</i>		A	
Common Zebra-tailed Lizard	<i>Callisaurus draconoides</i>		A	Fragmentation
Western Banded Gecko	<i>Coleonyx variegatus</i>	F, M	A	Fragmentation
Desert Iguana	<i>Dipsosaurus dorsalis</i>	F	C	Fragmentation
Long-nosed Leopard Lizard	<i>Gambelia wislizenii</i>	F	U	Fragmentation
Gila Monster	<i>Heloderma suspectum</i>	F, M	U (Mts)	Fragmentation
Mediterranean Gecko	<i>Hemidactylus turcicus</i>		NN	
Elegant Earless Lizard	<i>Holbrookia elegans</i>	L-t F	R (Mts)	
Goode's Desert Horned Lizard	<i>Phrynosoma (platyrhinos) goodei</i>	F	Ext?	Fragmentation
Regal Horned Lizard	<i>Phrynosoma solare</i>		C	
Common Chuckwalla	<i>Sauromalus ater</i>	L-t F	R (Mts)	
Clark's Spiny Lizard	<i>Sceloporus clarkii</i>	L-t F	C (Mts)	
Desert Spiny Lizard	<i>Sceloporus magister</i>		A	
Long-tailed Brush Lizard	<i>Urosaurus graciosus</i>	F	R	Fragmentation
Northern Tree Lizard	<i>Urosaurus ornatus</i>		A	
Common Side-blotched Lizard	<i>Uta stansburiana</i>		A	Fragmentation

Group (English Name)	Scientific Name	Threats from Proposed I-11	Current Status in Avra Valley	Urbanization Threats *
Snakes (23 species)				
Glossy Snake	<i>Arizona elegans</i>	F, M	U	Fragmentation
Banded Sand Snake	<i>Chilomeniscus cinctus</i>	F, M	C	Fragmentation
Tucson Shovel-nosed Snake	<i>Chionactis annulata klauberi</i>	F, M	Ext?	Fragmentation
Western Diamondback	<i>Crotalus atrox</i>		A	
Sidewinder	<i>Crotalus cerastes</i>	F	C	Fragmentation
Black-tailed Rattlesnake	<i>Crotalus molossus</i>	L-t F	C (Mts)	
Mojave Rattlesnake	<i>Crotalus scutulatus</i>	F, M	U	Fragmentation
Tiger Rattlesnake	<i>Crotalus tigris</i>	L-t F	C (Mts)	
Desert Nightsnake	<i>Hypsiglena chlorophaea</i>		C	Fragmentation
Common Kingsnake	<i>Lampropeltis getula</i>		C	Fragmentation
Sonoran Whipsnake	<i>Masticophis bilineatus</i>	L-t F	C (Mts)	
Coachwhip	<i>Masticophis flagellum</i>		A	Fragmentation
Sonoran Coralsnake	<i>Micruroides euryxanthus</i>	F, M	R	Fragmentation
Saddled Leaf-nosed Snake	<i>Phyllorhynchus browni</i>	F, M	U	Fragmentation
Spotted Leaf-nosed Snake	<i>Phyllorhynchus decurtatus</i>	F, M	U	Fragmentation
Sonoran Gopher Snake	<i>Pituophis catenifer</i>		C	Fragmentation
Western Threadsnake (Blindsnake)	<i>Rena humilis</i>		C	Fragmentation
Long-nosed Snake	<i>Rhinocheilus lecontei</i>	F, M	C	Fragmentation
Western Patch-nosed Snake	<i>Salvadora hexalepis</i>		C	Fragmentation
Ground Snake	<i>Sonora semiannulata</i>	F, M	R	Fragmentation
Southwestern (Smith's) Black-headed Snake	<i>Tantilla hobartsmithi</i>		R	Fragmentation
Checkered Gartersnake	<i>Thamnophis marcianus</i>		U	Fragmentation
Sonoran Lyre Snake	<i>Trimorphodon lambda</i>	L-t F	C	Fragmentation
Turtles (2 species)				
Sonoran Desert Tortoise	<i>Gopherus morafkai</i>	L-t F	C (Mts)	Multiple
Sonoran Mud Turtle	<i>Kinosternon sonoriense</i>		U	Desiccation

Group (English Name)	Scientific Name	Threats from Proposed I-11	Current Status in Avra Valley	Urbanization Threats *
Amphibians (10 species)				
Great Plains Toad	<i>Bufo (Anaxyrus) cognatus</i>		C	Fragmentation
Red-spotted Toad	<i>Bufo (Anaxyrus) punctatus</i>	L-t F	C (Mts)	
Sonoran Green Toad	<i>Bufo (Anaxyrus) retiformis</i>	F, M	Ext?	Fragmentation
Woodhouse's Toad	<i>Bufo (Anaxyrus) woodhousii</i>	M	Ext?	Desiccation
Sonoran Desert (Colorado River) Toad	<i>Bufo (Incilius) alvarius</i>	M	C	Fragmentation
Western Narrow-mouthed Toad	<i>Gastrophryne olivacea</i>	F, M	Ext?	Fragmentation
American Bullfrog	<i>Rana (Lithobates) catesbeiana</i>		NN	
Lowland Leopard Frog	<i>Rana (Lithobates) yavapaiensis</i>		Ext	Desiccation
Couch's Spadefoot	<i>Scaphiopus couchii</i>		A	
Mexican Spadefoot	<i>Spea multiplicata</i>	F, M	R	Desiccation

* Fragmentation threat includes highway barrier and road mortality in all cases