



Coalition for Sonoran Desert Protection

738 N. 5th Ave., Suite 205
Tucson, Arizona 85705
520.388.9925 ✉ sonorandesert.org

July 20, 2021

Arizona Center for Law
in the Public Interest

Arizona Native Plant
Society

Bat Conservation
International

Cascabel Conservation
Association

Center for Biological
Diversity

Center for Environmental
Ethics

Defenders of Wildlife

Desert Watch

Environmental Law
Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro
National Park

Friends of Tortolita

Gates Pass Area
Neighborhood
Association

Genius Loci Foundation

Great Old Broads for
Wilderness— Tucson

Native Seeds / SEARCH

Protect Land and
Neighborhoods

Safford Peak Watershed
Education Team

Save the Scenic Santa Ritas

Sierra Club – Grand
Canyon Chapter

Sierra Club – Rincon Group

Sky Island Alliance

Southwestern Biological
Institute

Tortolita Alliance

Tucson Audubon Society

Tucson Herpetological
Society

Tucson Mountains
Association

Wildlands Network

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

RE: Request for comment deadline extension by 90 days for the I-11 Final Tier 1 Environmental Impact Statement

To Whom It May Concern:

We are requesting a 90-day extension for submitting comments on the Final Tier 1 Environmental Impact Statement (EIS) and Preliminary Section 4(f) Evaluation and associated materials. There has been an enormous amount of public interest in and concern about this project in the Pima County region. The 30-day comment period is insufficient for review of the documents and ensuring the public is aware of the opportunity to review and comment on the project. Because the impacts of this project are intergenerational, we urge you to consider an extension to provide the public with a full and fair opportunity to participate in this process.

Many of the communities impacted by the Preferred Alternative Options within the Corridor Study area are minority and low-income populations who in many cases do not have access to the traditional means by which federal EIS processes are advertised and published. We became aware of issues related to accessing the project documents during our outreach for the Draft EIS comment period. Both proposed alternatives will have disproportionate adverse effects on these populations and they will need adequate time to be notified via ground mail or other means. Additionally, the Western Alternative through Pima County is proposed through traditional Tohono O'odham lands where tribal members may have limited internet access.

A comment period extension is also warranted at this stage of the process because of the anticipated length of the document and the unprecedented nature of this project. The Draft EIS documents totaled close to 5000 pages of text, maps, and other figures. A new Interstate freeway has not been built in this metropolitan area since 1961 – over two generations ago. Many of the issues will have long-lasting, significant impacts on our community and we need sufficient time to review the record, research issues and concerns, and provide a substantive response.

Thank you for considering this request. As always, we appreciate the time you have put into this effort.

Sincerely,

Carolyn Campbell
Executive Director