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I-11 Tier 1 EIS Study Team c/o ADOT Communications
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Subject: Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg.

Also sent by email to: I-11ADOTStudy@hdrinc.com

The Tucson Herpetological Society (THS) was founded in 1988; its purpose:

- To promote the discovery and dissemination of knowledge concerning the biology of amphibians and reptiles in general and the herpetofauna of the Sonoran Desert and the State of Arizona in particular.
- To encourage conservation of wildlife in general and of amphibians and reptiles in particular.
- To promote public awareness and appreciation of amphibians and reptiles through education.
- To facilitate fellowship among persons of southern Arizona and Mexico with a common interest in herpetology.

The Society, with approximately 200 members, issues a quarterly professional publication, The Sonoran Herpetologist, and is proud to include several active and retired herpetologists with expertise on the reptiles and amphibians (herpetofauna) of southern Arizona and northern Mexico.

In this letter we provide our concerns about the potential impacts of construction of a new freeway through the Avra Valley on amphibian and reptile species (the herpetofauna) and their habitats. We also provide information about special areas of concern along with the currently recommended alternative for an I-11 through the Avra Valley (known in the I-11 Corridor Draft Tier 1 EIS, especially including reference to Section 3.14. Biological Resources as the Green option).

We support the broad and strong concerns about I-11 indicated by the Coalition for Sonoran Desert Protection, notably including connectivity issues between mountain-centered desert preserves. Here we focus primarily on concerns about our special area of interest:

- Avra Valley and Santa Cruz Flats support high biodiversity of amphibians and reptiles and other desert species, contributing to quality-of-life there and in Tucson generally.
- The “preferred” I-11 route uses mostly natural open space, much of it publicly owned.
- I-11 will therefore cause large-scale destruction and fragmentation of valley habitat.
- This will lead to widespread local population and species extinctions in these valleys.

Details and related concerns are explained below. We attach an annotated list of the species of amphibians and reptiles that are known to inhabit the Avra Valley (Table 1). We have indicated the occurrence of each species as known to us, the predicted impacts of the proposed route of the I-11, and the kind and level of impact expected for each species.

Our position is that to ensure the sustainability of populations of native species and their habitats in the Avra Valley and associated mountains, the I-11 must not be built there. 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.

We have examined the preferred alternative route through the Avra Valley and we see that it is following existing natural open spaces. Thus, it appears that 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.

In examining the maps available we note that the proposed I-11 is shown to pass through a parcel of Bureau of Reclamation land that was established as a mitigation corridor for the Central Arizona Project (CAP). We are firmly opposed to 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 can identify some areas that are most important for protecting the sustainable future of our native species. The central area of Brawley Wash extending north as far as Trico Road is overall a large open space with many species that should be protected. The sand ridge extending

northwest from Sanders Road along Silverbell Road with much intact Sonoran Desert scrub, supports many desert specialist species that should be protected. The region immediately north of the sand ridge is an affected area that includes the Oro Blanco wash bottom and the margins of Ironwood Forest National Monument extending northward to the Santa Cruz Flats. Development here would create a major barrier to wildlife connectivity between Ironwood Forest (and “points west”) and Picacho Peak State Park, Picacho Mountains, and points north and east. The connectivity is essential to the sustainability of native species. Similarly, we are concerned that much intact Sonoran Desert Scrub will be severely impacted between the cutoff from I-19 west and north into the southern Avra Valley.

The land in the Avra Valley already has been beleaguered by intensive land uses. We expect additional development, but we know that development can be sited in such a way as to maintain habitat and connecting corridors for our native wildlife. What is most concerning from our point of view is that the preferred alternative for I-11 in the Avra Valley region relies almost exclusively on existing natural open space, notably impacting the currently publicly owned natural open space that provides the essential conservation framework for both local species conservation and wildlife corridors.

We believe that no amount or type of mitigation as proposed in the section on Biological Resources can come as close to the habitat protection and species sustainability as co-locating the I-11 along the Tucson corridor of the I-10.

Even without considering the more extensive impacts we outline here, the Draft Tier 1 EIS repeatedly admits that the route through the Avra Valley, known previously as the Green Option, will cause much more habitat loss, disruption of migrations corridors, and habitat degradation than a route along the I-10 corridor. To select this alternative in spite of all of the clear predictions about species and habitat loss is not in the best interests of a future that includes our native species and their habitats within and near the great metropolitan area of eastern Pima County and southern Pinal County. The future of reconciling urban or suburban development with natural amenities is at stake.

The alternative of enlarging the I-10, through Tucson, is a more viable alternative, a less expensive alternative, and a more appropriate alternative that will keep traffic on routes that are already developed and leave more space to accommodate native habitats and species. This would assure that Arizona will maintain the natural lands that not only protect native species but also provide extensive opportunities for recreation and tourism as economic benefits to the Tucson region

We are concerned as to how the final documents satisfy the existing Pima County Multi-Species Conservation Plan that has been approved by the U. S. Fish and Wildlife Service and the Pima County Board of Supervisors. Please address this.

We are concerned that the I-11 Tier 1 EIS Study Team has not been allowed to consider the use of alternative transportation systems, such as railroad transport, to move goods north and south through this area before deciding on a preferred alternative. Will any entity assess that potential alternative? We think that, before settling on the construction of additional freeways, such an

choice must be considered. We note that such consideration seems likely to dovetail with consideration of passenger rail service in the Tucson-Phoenix corridor that may have other socially and environmentally significant benefits.

We expect that the Arizona Department of Game and Fish, in possession of a database concerning the current, known distribution of native species, not accessible to the public, will provide a thorough review of the predictable impacts of the I-11 on the native species, natural habitats, and habitat corridors that currently exist in the Avra Valley and in other areas along any proposed new freeway construction. We want to be informed of the results of that analysis.

We thank you for your consideration of these identified issues and we expect that your next report will respond to each of them. In addition to this letter we have also signed the letter from the Coalition for Sonoran Desert Protection, of which we are a member organization.

Sincerely,



Robert A Villa, President

Cc:

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