



Coalition for Sonoran Desert Protection

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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