



DRAFT MEMORANDUM

Date: January 19, 1999

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator 

Re: Correspondence Received in Response to the Draft *Sonoran Desert Conservation Plan*

The attached correspondence was received by my office in response to the draft *Sonoran Desert Conservation* concept document during the comment period which lasted nearly twelve weeks (October 27, 1998 to January 15, 1999).

A total of 170 letters or documents were received. An estimated 59 non-governmental organizations or individuals have expressed an interest in participating in developing the plan. The 59 parties reflect constituencies as diverse as the conservation community, neighborhood groups, ranchers, miners, landowners, private property advocates, developers, home builders, the real estate industry, and water interests.

Legislative action and other communication indicates that the Tohono O'odham Legislative Council supports the County's effort. Likewise, eight federal entities,¹ four state departments,² and a number of local incorporated areas have expressed willingness (either informally or in writing) to work with Pima County. With the exception of letters from the McGee Ranch community, there is only one letter that wholly rejects the *Sonoran Desert Conservation* concept. Initial concerns from certain neighborhoods and some members of the ranch community have been addressed in meetings and will continue to be addressed through the planning process itself.

I am currently drafting a report for the Board's January 26, 1999 meeting which provides a summary and analysis of the detailed responses from the community, recommends the formation of a Steering Committee, and makes recommendations about measures that the Board might consider to protect the pygmy-owl while the long term conservation plan is being developed. The attached documents are presented in the order they were received.

¹ (1) United States Department of Agriculture, Forest Service, Coronado National Forest; (2) Department of Defense, United States Air Force, Ranges and Airspace Division; (3) United States Department of the Interior, Bureau of Land Management; (4) United States Department of the Interior, Bureau of Reclamation; (5) United States Department of the Interior, Office of the Secretary; (6) United States Department of the Interior, National Parks Service; (7) United States Department of the Interior, U.S. Fish and Wildlife Service; and (8) United States Geological Survey.

² (1) Arizona Department of Environmental Quality; (2) Arizona Department of Water Resources; (3) Arizona Game and Fish Department; and (4) Arizona State Land Department.

Chronology of All Correspondence

October 29, 1998

1. Alan Lurie, Executive Vice President, Southern Arizona Home Builders Association

November 2, 1998

2. Mary Darling, Darling Environmental & Surveying

November 9, 1998

3. Jonathan DuHamel, President, Tucson Chapter of People for the USA!

November 10, 1998

4. Joe Parsons, President, Parsons Ranches

November 12, 1998

5. Town Council of Sahuarita
6. Ellen Barnes

November 14, 1998

7. Kenn Schultz

November 16, 1998

8. Michael Zimet, Founder, Pima County Private Property Rights Association

November 17, 1998

9. Luther Propst, Executive Director, Sonoran Institute
10. Ed and Margaret Bieber, Green Valley residents
11. Mark Miller

November 18, 1998

12. Chuck Sweet, Town Manager, Town of Oro Valley

November 19, 1998

13. Michael Winn, President, Ecological Restoration and Management Associates

November 20, 1998

14. David Nix, University Attorney, University of Arizona
15. Aurelia Acton
16. Jeanie Marion

November 22, 1998

17. Graham Barton

November 23, 1998

18. John Bordenave, Enchanted Hills Neighborhood Association
19. Brian and Karen Metcalf
20. Lan Lester, Town of Tortolita

November 24, 1998

21. John McGee, Forest Supervisor, Coronado National Forest
22. Patricia Richardson, Vice President, Tucson Association of Realtors
23. David Hogan, Southwest Center for Biological Diversity
24. Lawrence Aldrich, President, Southern Arizona Leadership Council

November 25, 1998

25. Jud Richardson, President, Green Valley Coordinating Council

November 27, 1998

26. John Menke, President, Saguaro Forest Associates

November 29, 1998

27. Jan Gingold, President, Pima Trails Association
28. Andra Ewton, Defenders of Wildlife
29. Rob Kulakofsky, Center for Wildlife Connections

November 30, 1998

30. Ren Lohofner, Department of the Interior, United States Fish and Wildlife Service
31. David Walker, Habitat Branch Chief, Arizona Game and Fish Department
32. Christina McVie, Desert Watch
33. Doug McVie, Desert Watch
34. Barbara Rose, Northern Tucson Mountains Resource Conservation/Education Project
35. Glenda and Robert Zahner
36. John Pimental

December 1, 1998

37. David Mehl, President, Cottonwood Properties
38. Robert Smith

December 3, 1998

39. William Hallihan, Vice President, Cottonwood Properties
40. Tim Blowers

December 4, 1998

41. Neale Allen, Mountainview Homeowners Association

December 6, 1998

42. Jeanne Rosengren, Tucson Mountain Park area

December 7, 1998

- 43. Jim Shiner
- 44. Bill Arnold

December 8, 1998

- 45. City of Tucson Staff Review
- 46. Bob Deming, Mary Kidwell

December 9, 1998

- 47. Lora Awtrey, McGee Ranch, Sierrita Mountains
- 48. Janette Awtrey, McGee Ranch, Sierrita Mountains
- 49. Bruce Gungle, Tucson Mountains Association

December 10, 1998

- 50. Tim Terrill, Metropolitan Pima Alliance
- 51. Cassandra Martinez, McGee Ranch, Sierrita Mountains

December 12, 1998

- 52. Donald and Carolyn Honnas, Honnas Land and Cattle

December 14, 1998

- 53. Patricia Awtrey, McGee Ranch, Sierrita Mountains
- 54. Frances Werner
- 55. Robyn and Lois Benson, Lou Benson Construction Company
- 56. Laurence Marc Berlin

December 15, 1998

- 57. Rodger Schlickeisen, Defenders of Wildlife

December 16, 1998

- 58. Lynn Harris, Gary Fox, David Harris, Sierrita Mining and Ranching Company
- 59. Fred Depper, McGee Ranch, Sierrita Mountains

December 17, 1998

- 60. David Hogan, Southwest Center for Biological Diversity
- 61. Tim Terrill, Metropolitan Pima Alliance

December 18, 1998

- 62. Luther Propst, Sonoran Institute

December 21, 1998

- 63. Richard Rosen

December 22, 1998

64. Mike Hein, Town of Marana
65. Kate Hiller
66. Lynn Harris and Lucille Depper, McGee Ranch, Sierrita Mountains

December 23, 1998

67. Pima County Open Space Acquisition Review Committee

December 26, 1998

68. Buffers

December 27, 1998

69. Linda Griggs, Tucson Mountains Association
70. Marcy Tigerman, Tucson Mountains Association
71. Patricia DeWitt, Tucson Mountains Association
72. Gary Forbes, Tucson Mountains Association
73. Marcel and Olga Nuets, Tucson Mountains Association

December 28, 1998

74. Gary Fox, McGee Ranch, Sierrita Mountains
75. Dale Turner, Sky Island Alliance

December 29, 1998

76. L.G. and Barbara Wilson, Tucson Mountains Association
77. Village of Casas Adobes

December 30, 1998

78. Rincon Institute

January 3, 1999

79. Janette Awtrey, McGee Ranch, Sierrita Mountains

January 4, 1999

80. Tucson-Pima County Historical Commission
81. Arizona Department of Environmental Quality
82. Richard Daley, Executive Director, Desert Museum
83. John Martin, Tucson Mountains Association
84. Jill Rich, Tucson Mountains Association
85. Don Arkin and Sharon Emley, Tucson Mountains Association
86. Susan Zakin, Tucson Mountains Association
87. Thomas Wiewandt, Tucson Mountains Association
88. Mildred Kiteser, Tucson Mountains Association
89. Beverly Manfredonia, Tucson Mountains Association
90. Jill Littrell, Tucson Mountains Association

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91. Jean Moore, Tucson Mountains Association
92. Ann Dursch, Tucson Mountains Association
93. Catherine Penny, Tucson Mountains Association

January 5, 1999

94. Erleen Martin, Tucson Mountains Association
95. Richard Genser
96. Richard D. Harris, McGee Ranch, Sierrita Mountain Coalition
97. Lynn Harris or Heather Fox, Sierrita Mining & Ranching
98. Lynn Harris, Sierrita Mining & Ranching
99. James Harris, McGee Ranch, Sierrita Mountains
100. Mary Ann Riley, c/o McGee Ranch, Sierrita Mountains
101. Betty Oryall, c/o McGee Ranch, Sierrita Mountains
102. Todd and Suzy Harris, McGee Ranch, Sierrita Mountains

January 6, 1999

103. Katharine Jacobs, Arizona Department of Water Resources
104. Dudley Fox, McGee Ranch, Sierrita Mountains
105. John Harris, McGee Ranch, Sierrita Mountains

January 7, 1999

106. Bruce Ellis, Diane Laush, United States Department of Interior, Bureau of Reclamation
107. Center for Wildlife Connections
108. Carl Davis, President, Silverbell Mountain Alliance

January 8, 1999

109. Tohono O'odham Legislative Council, Resolution 99-011, Section 3.
110. Nancy Wall
111. Gay Lynn Goetzke

January 9, 1999

112. Neal and Karen Harris, McGee Ranch, Sierrita Mountains
113. Barbara McDewitt, c/o McGee Ranch, Sierrita Mountains
114. Patricia McGee Coughanour, McGee Ranch, Sierrita Mountains
115. Augusta Davis, Tucson Mountains Association

January 10, 1999

116. William Crosby, Director, Environmental & Cultural Conservation Organization
117. Bill Schnauffer, Navarro Ranch
118. Dan Beckel, President, Andrada Property Owners

January 11, 1999

119. City of Tucson, Mayor and City Council
120. Lois Kulakowski, Kathy Jacobs and Mark Myers, Tucson Regional Water Council

121. Natalie McGee, McGee Ranch, Sierrita Mountains
122. Mona Allen Wolters, McGee Ranch, Sierrita Mountains
123. Michael, Wolters, McGee Ranch, Sierrita Mountains
124. Larry Wolters, McGee Ranch, Sierrita Mountains
125. Carol Klamerus, President, Tucson Mountains Association
126. Holly Finstrom, Tucson Mountains Association
127. Jayne Kahle, Tucson Mountains Association

January 12, 1999

128. Jesse Juen, United States Department of the Interior, Bureau of Land Management
129. Dennis Wells, State Land Commissioner, Arizona State Land Department
130. Lisa Stage, Women for Sustainable Technologies
131. Lucy Vitale, Line by Line Editorial Services
132. Penelope Harris, McGee Ranch, Sierrita Mountains
133. Norman Harris, McGee Ranch, Sierrita Mountains
134. Donna McGee, McGee Ranch, Sierrita Mountains
135. Judy Ann Fox, McGee Ranch, Sierrita Mountains
136. Sheldon Fox, McGee Ranch, Sierrita Mountains
137. Les Harris, McGee Ranch, Sierrita Mountains
138. Jeremy Harris, McGee Ranch, Sierrita Mountains
139. Stephen Bacchus, McGee Ranch, Sierrita Mountains
140. Melissa Bacchus, McGee Ranch, Sierrita Mountains
141. Kathy McGee, McGee Ranch, Sierrita Mountains
142. Charles Bristow, McGee Ranch, Sierrita Mountains
143. Elizabeth Espinoza, c/o McGee Ranch, Sierrita Mountains
144. Sarah Baker, c/o McGee Ranch, Sierrita Mountains
145. Wendell Baker, c/o McGee Ranch, Sierrita Mountains
146. B. Vermeerech, c/o McGee Ranch, Sierrita Mountains
147. Judith Murphy, McGee Ranch, Sierrita Mountains
148. Carlene Peck, c/o McGee Ranch, Sierrita Mountains
149. Anne Davidson, c/o McGee Ranch, Sierrita Mountains
150. Eileen Bradford, c/o McGee Ranch, Sierrita Mountains
151. W.D. Matthews, c/o McGee Ranch, Sierrita Mountains
152. Southern Lago del Oro Community

January 13, 1999

153. Carolyn Campbell, Coalition for the Sonoran Desert Protection Plan
154. Carol Duffner and Joe Murray, Northwest Coalition for Responsible Development
155. Gene and Marvyl Wendt, Wrong Mountain Wildlife Preserve
156. Dee Kinsey and Carol Ehrlich
157. Sharon Conine (Medema-McGee), McGee Ranch, Sierrita Mountains
158. Ernest Burnham, McGee Ranch, Sierrita Mountains

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January 14, 1999

159. Les Corey, The Nature Conservancy,
160. Vicki Cox Golder, Golder Ranch
161. Zephaniah Guy Kirkpatrick, Silverbell Mountain Alliance
162. Quinn Simpson, Center for Environmental Ethics

January 15, 1999

163. Franklin Walker, United States Department of the Interior, National Park Service
164. Alter Valley Conservation Alliance: P.King, M.Miller, M. King, A.McGibbon, S. Chilton
165. George Bender, Cyprus Sierita Mining Company
166. Gerald Juliani, Pure Water Coalition
167. Arizona Game & Fish Department
168. Charles Award, Southern Lago del Oro Community
169. Southwest Network for Environmental and Economic Justice (Nogales)
170. Defenders of Wildlife

Chronology of Non-Governmental Applicants for the Steering Committee

- | | | |
|-----|---------------------|--|
| 1. | Alan Lurie | Southern Arizona Home Builders Association |
| 2. | Mary Darling | Darling Environmental & Surveying |
| 3. | Jonathan DuHamel | Tucson Chapter of People for the USA! |
| 4. | Joe Parsons | Parsons Ranches |
| 5. | Ellen Barnes | Landowner |
| 6. | Michael Zimet | Pima County Private Property Rights Association |
| 7. | Michael Winn | Ecological Restoration and Management Associates |
| 8. | John Bordenave | Enchanted Hills Neighborhood Association |
| 9. | Patricia Richardson | Tucson Association of Realtors |
| 10. | David Hogan | Southwest Center for Biological Diversity |
| 11. | [To be determined] | Southern Arizona Leadership Council |
| 12. | Jud Richardson | Green Valley Coordinating Council |
| 13. | John Menke | Saguaro Forest Associates |
| 14. | Jan Johnson | Pima Trails Association |
| 15. | Andra Ewton | Defenders of Wildlife |
| 16. | Rob Kulakofsky | Center for Wildlife Connections |
| 17. | Christina McVie | Desert Watch |
| 18. | Doug McVie | Landowner |
| 19. | Barbara Rose | N.Tucson Mnts Resource Conservation Project |
| 20. | William Hallihan | Cottonwood Properties |
| 21. | Tim Blowers | Developer / Landowner |
| 22. | Neale Allen | Mountainview Homeowners Association |
| 23. | Jim Shiner | Developer / Landowner |
| 24. | Bill Arnold | Real Estate |
| 25. | Bruce Gungle | Tucson Mountains Association |
| 26. | Tim Terrill | Metropolitan Pima Alliance |

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27.	Donald/Carolyn Honnas	Honnas Land and Cattle
28.	Frances Werner	Landowner
29.	Robyn/Louis Benson	Lou Benson Construction Company
30.	Laurence Marc Berlin	Attorney / Private Property
31.	Luther Propst	Sonoran Institute
32.	Kate Hiller	Citizen's Alliance for Responsible Growth
33.	G. Hartmann/N.Young Wright	Buffers
34.	Dale Turner	Sky Island Alliance
35.	Richard Daley	Desert Museum
36.	John Martin	Landowner
37.	Richard Genser	Real Estate
38.	Richard D. Harris	McGee Ranch, Sierrita Mountain Coalition
39.	Lynn Harris or Heather Fox	Sierrita Mining & Ranching
40.	Carl Davis/ ZG Kirkpatrick	Silverbell Mountain Alliance
41.	Gay Lynn Goetzke	Property Rights
42.	William Crosby	Environmental & Cultural Conservation Organization
43.	Dan Beckel	Andrada Property Owners Association
44.	Mark Myers	Tucson Regional Water Council
45.	Lisa Stage	Women for Sustainable Technologies
46.	Lucy Vitale	Line by Line Editorial Services
47.	Carolyn Campbell	Coalition for the Sonoran Desert Protection Plan
48.	Carol Duffner/Joe Murray	Northwest Coalition for Responsible Development
49.	Les Corey	The Nature Conservancy
50.	Vicki Cox Golder	Real Estate / Golder Ranch
51.	Quinn Simpson	Center for Environmental Ethics
52.	Pat/ Macaela King	Anvil Ranch
53.	Mary Miller	Elkhorn Ranch
54.	Andrew McGibbon	Alter Valley Alliance
55.	Sue Chilton	Chilton Ranch
56.	George Bender	Cyprus Sierita Mining Company
57.	Gerald Juliani	Pure Water Coalition
58.	Charles Award	Southern Lago del Oro Community
59.	Teresa Leal	SW Network Environ / Economic Justice (Nogales)

Attachments



Southern Arizona Home Builders Association

"Building Tucson With Purpose And Pride"

October 29, 1998

Chuck Huckelberry
County Administrator
130 W. Congress, 10th Floor
Tucson AZ 85701-1317

Dear Chuck,

Congratulations on preparation of the Sonoran Desert Conservation Plan and its presentation to the board of Supervisors. The plan does an excellent job of framing issues critical to our community.

As the various elements of the plan are developed, SAHBA would indeed welcome an opportunity to participate in the development process.

Therefore, submitted herewith is a formal request that SAHBA be represented on the steering committee(s). It is unclear if the intent is to have one steering committee for the comprehensive planning process and additional committees for elements of the plan. In any event SAHBA would appreciate an opportunity to participate in any or all committees.

Thank you for your consideration.

Sincerely,

Alan Lurie
Executive Vice President

Darling Environmental & Surveying, LTI

3431 N. Camino de Piedras

Tucson, Arizona 85750

(520) 298-2725

Fax: (520) 298-2767

Page 1 of 2

November 2, 1998

Pima County Administrative Office
Pima County Governmental Center
Mr. Chuck Huckleberry
130 W. Congress
Tucson, AZ 85701-1317

Dear Mr. Huckleberry:

Please appoint me as a Steering Committee member of the Pima County Multi Species Habitat Conservation Plan. Attached is a resume and list of some pertinent projects that demonstrate my expertise on the subject.

I am an active member of the Tucson community and want to assist the County in development and implementation of a Habitat Conservation Plan (HCP) that resolves as many of our endangered species management issues as possible. My scientific and legal background as well as my experience working on two very successful County HCPs provide me with unique expertise that I can bring to the steering committee.

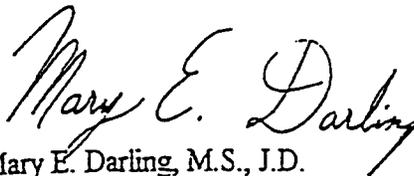
A summary of my experience with endangered species includes, but is not limited to:

1. Development of a County HCP for a project potentially affecting a threatened species. This activity included all work necessary to obtain an incidental take permit under the ESA.
2. Member of a County-wide Multi Species HCP Team in Clark County, Nevada (Las Vegas).
3. Member of the Cactus Ferruginous Pygmy-Owl Recovery Team subcommittee.
4. Performance of surveys of proposed projects to assure compliance with the requirements of the ESA.

5. Identification and mapping of potential habitat for pygmy-owls and other species listed under the ESA.
6. Expertise in the survey and analysis of fauna and flora in the Sonoran Desert Region.
7. Knowledge and understanding of federal and state laws relating to the protection and conservation of natural habitats in the Sonoran Desert Region.
8. Knowledge and experience with the provisions and processes set forth in the ESA.
9. State and federal permits necessary to conduct population and habitat surveys under the ESA.

I look forward to hearing from you about my request. I am available to begin immediately.

Sincerely,
Darling Environmental & Surveying, LTD.



Mary E. Darling, M.S., J.D.
Vice President/Senior Wildlife Biologist

Enclosure

Darling Environmental & Surveying, LTD.
3431 N. Camino de Piedras
Tucson, Arizona 85750
(520) 298-2725/Fax: (520) 298-2707

MARY E. DARLING, M.S., J.D.

*Environmental Permitting
Legal Research and Analysis
Threatened and Endangered Species
GPS/GIS Habitat Mapping*

SUMMARY OF PROFESSIONAL EXPERTISE

Ms. Darling has 18 years of experience in natural resource management. She is a professional wildlife biologist, specializing in environmental planning and permitting. Ms. Darling has significant expertise in threatened and endangered species management.

UNIVERSITY DEGREES

University of the Pacific, McGeorge School of Law	Juris Doctorate Environmental Law, 1984
California State University, Sacramento	M.S. in Biological Sciences, 1980
California State University, Sacramento	B.S. in Biological Sciences, 1977

RELEVANT PROFESSIONAL CONTINUING EDUCATION AND TRAINING

Utah State University	Raptor Identification and Biology, 1992
University of Northern Arizona	Wildlife Habitat Relationship Course, 1990

RELEVANT PROFESSIONAL MEMBERSHIP

The Wildlife Society
Desert Fishes Council
American Fisheries Society

PROFESSIONAL HISTORY

Darling Environmental & Surveying, LTD, Vice President, 1996 to date
Environmental Consultant, 1992 to 1996
U.S.D.A., Forest Service, Wildlife and Fisheries Program Manager,
1986-1992
U.S.D.A., Forest Service, Assistant Forest Planner, Appeals and
Litigation Coordinator and NEPA Coordinator, 1984-1986
U.S.D.A., Forest Service, Fisheries and Wildlife Biologist, 1979-1984
California Department of Fish and Game, Fisheries Technician, 1976-1979
U.S. Navy, San Clemente Island, Ecological Technician, 1975

Darling Environmental & Surveying, LTD.
3431 N. Camino de Piedras
Tucson, Arizona 85750
Tel (520) 298-2725/FAX 298-2767

THREATENED AND ENDANGERED SPECIES EXPERIENCE

Habitat Conservation Plan, Clark County (Las Vegas), Nevada: Ms. Darling is presently a member of a long-term HCP team, determining management of more than 210 species and their habitats in Clark County, Nevada. Native birds, mammals, fishes, reptiles, amphibians, insects and plants are included in this major planning project.

Habitat Conservation Plan, Nye County, Nevada: Ms. Darling wrote a Habitat Conservation Plan (HCP) and the accompanying Environmental Assessment, Biological Assessment, and Implementation Agreement documents for Nye County Department of Public Works. The documents and coordination meetings resulted in US Fish and Wildlife Service issuing the County an incidental take permit for the threatened Mojave desert tortoise in Pahrump, Nevada. She was also able to obtain a temporary, emergency "takings" permit for the County, as an interim measure, until all aspects of the incidental take permit requirements were met. Ms. Darling removed and relocated desert tortoises, cacti, yucca, and Joshua trees during the Pahrump project. She also authored a revegetation plan that will be incrementally implemented over the life of the project.

Cactus Ferruginous Pygmy-Owl, Arizona: Ms. Darling is currently permitted by US Fish and Wildlife Service to survey Cactus Ferruginous Pygmy-Owls and their habitat in Arizona. This owl is listed as an endangered species in Arizona. She has performed more than sixty surveys for clients including Pima County, school districts, home owners, realtors, and developers in southeastern Arizona to determine presence or absence of Cactus Ferruginous Pygmy-Owls and to assess potential habitat capability of the lands. Ms. Darling prepared a literature review and detailed analysis of more than 100 relevant articles on the Cactus Ferruginous Pygmy-Owl. She also prepared detailed comments on the USFWS proposed listing of the owl.

Sonoran Native Plants: Ms. Darling performs native plant inventories and produces native plant preservation plans in accordance with the Pima County Native Plant Preservation Ordinance for a variety of clients, including Pima County Department of Parks and Recreation.

Southwestern Willow Flycatcher, Arizona: Ms. Darling is currently permitted by US Fish and Wildlife to survey the endangered southwestern willow flycatcher in Arizona. She has surveyed willow flycatchers in Nevada and California for the past three years.

Cienega Species, Arizona: Ms. Darling is currently permitted by US Fish and Wildlife to survey the endangered Sonoran salamander in Arizona. She has worked with salamanders on several aquatic projects and is current on locations and biological issues in Arizona.

Jaguars and Ocelots, Arizona: Ms. Darling is actively working on updating currently US Fish and Wildlife Service and Arizona Game and Fish information on the location and breeding records of jaguars and ocelots in Arizona. She is obtaining the unwritten history of these cats from trappers and hunters.

San Pedro River, Arizona: Ms. Darling performed three field assessments on portions of the San Pedro River watershed as part of a threatened and endangered species habitat overview. She is familiar with the various habitat

Mary E. Darling, M.S., J.D.

types and animals present. She is currently involved in extensive endangered species management issues along the river.

Little Colorado Spinedace, Spikedace, Loach Minnow, Arizona: Ms. Darling performed field surveys, then prepared reports and affidavits regarding these threatened species of fish.

Spotted Owls and Goshawks, California and Nevada: Ms. Darling performed field surveys to determine presence or absence of the California and Mexican spotted owls and Northern goshawks.

Bald Eagles and Ospreys, Shasta Lake, California: Ms. Darling monitored 12 nesting pairs of bald eagles and 52 osprey nests over a two-year period. She prepared habitat management plans for both birds.

Peregrine Falcons, Pit River, California: Ms. Darling monitored an active peregrine falcon nest on the Pit River in northern California.

Moapa Dace, Nevada: Ms. Darling performed field surveys, then prepared a report regarding the Moapa dace and nine other native desert fishes in southern Nevada. She is the only non-agency member of a Nevada native fisheries management team. Her role is to assure that private water rights are considered and preserved as fisheries recovery plans are finalized and implemented.

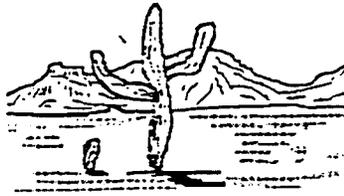
Mojave Desert Tortoise, Nevada: Ms. Darling performed 32 cattle allotment field surveys, prepared a report and an affidavit regarding the tortoise, and participated in a 10-day IBLA hearing on livestock grazing and tortoise issues. She assisted attorneys in preparing the case and testified as an expert witness.

Lahontan Cutthroat Trout, Nevada: Ms. Darling performed field surveys and prepared a report and an affidavit regarding this federally listed trout. She participated in three IBLA hearings on livestock grazing and trout. She also assisted attorneys in preparing the case and testified as an expert witness.

Redband Trout, Northern California: Ms. Darling performed population and habitat surveys for redband trout in twelve northern California streams in the McCloud River drainage. She then prepared an extensive habitat and population management plan for this threatened trout.

Bull Trout, Grizzly Bears, Wolves, and Lynx, Montana: Ms. Darling is presently the Senior Peer Reviewer for a series of studies and documents that will be incorporated into a Biological Assessment as part of Section 7 Endangered Species Act consultation.

Jonathan DuHamel
Consulting Geologist
AZ Reg. 19194



3150 W. Camino del Saguaro
Tucson, AZ 85745-1504

Phone: 520 743-9415
jedtaz@azstamet.com

November 9, 1998

C.H. Huckelberry
County Administrator
130 W. Congress
Tucson, AZ 85701-1317

Re: Steering Committee, Multi-species Habitat Conservation Plan

Dear Mr. Huckelberry,

After speaking with Ms. Maeveen Behan of your staff, I have come to better appreciate the importance of community participation County plans. I volunteer to participate as part of a steering committee related to development of a multi-species habitat conservation plan.

I am a geologist by profession and have been a Pima County resident since 1983. I am currently president of the Tucson chapter of People for the USA, a national environmental organization which seeks a balance between environmental protection and economic development. We are also concerned with preservation of private property rights. I think my presence on a steering committee would balance the demands of developers versus the more radical environmental groups.

In order to further our understanding of the Sonoran Desert Conservation Plan, I have invited Ms. Behan to address our chapter in December.

Please consider my inclusion in a steering committee.

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0
The Parsons Co., Inc.

dba PARSONS RANCHES

4580 NORTH HIGHWAY DRIVE • TUCSON, ARIZONA 85705

TEL: (520) 887-6207 • FAX: (520) 292-2636

November 10, 1998

Pima County Administration
130 W. Congress
Tucson, AZ 85701

Attn: Chuck Huckleberry

RE: Property Taxes - Ranches

After reading your comments in the paper about the lack of property taxes paid on ranches, I would like to bring to your attention the over all net economic effect by having ranchers continue to graze land.

For example, the places we graze are leased from developers, the Federal government, and the State of Arizona. The grass provides a renewable resource that raises approximately 400 calves a year at a gross income of approximately \$ 160,000.00. From the gross income we provide employment for 2 full time families and employ approximately another 10 people during shipping season.

All of our supplies are purchased locally in Pima County and our employees do their personal business here. When the year ends and all bills are paid we can hope to have 10 to 20% left over as profit, of which we pay taxes on the profit.

If you use a conservative multiplier factor on our income of 6 times then the direct economic impact to Pima County is \$ 960,000.00. By buying ranches and eliminating private enterprise you will have no way to replace this economic impact to the county, but you will also lose the caretakers and the stewards of the land and have to replace them with county employees. The real net loser is then the taxpayer to have to raise sales and property tax to fund these new responsibilities.

I would be happy to sit down with you or your staff and go over some of the properties and economic value of keeping as many ranchers in business as possible.

Since cattle, cotton, and copper have been the back bone of Arizona's growth in the early years, it would be sad to let our elected officials write off ranching as not being an important part of our economy before they have a chance to evaluate the facts.

Grass is a renewable natural resource and cattle can turn that grass in to beef and by products that are beneficial to the people. How can that be turned around by the media and special interest groups to be so bad.

Please give us a seat at the table because we support open space and less development also.

Sincerely,

PARSONS RANCHES



Joe M. Parsons
President

JMP;cj

cc: Board of Supervisors:
Mike Boyd
Dan Eckstrom
Sharon Bronson
Ray Carroll

TOWN OF SAHUARITA
NOVEMBER 12, 1998

Pursuant to A.R.S. Section 38-431.02, notice is hereby given to the public that the Sahuarita Town Council will be holding a Regular Meeting on Thursday, November 12, 1998. The meeting will begin at or after 7:00 pm, at the Sahuarita School Auditorium, 350 W. Sahuarita Road, Sahuarita, AZ.

REGULAR MEETING AGENDA
At or After 7:00 pm

1. CALL TO ORDER
Pledge of Allegiance
2. ROLL CALL
 - ___ Council Member Marco Aguilar
 - ___ Council Member Louis Butler
 - ___ Vice-Mayor Zachery Freeland
 - ___ Council Member Charles Oldham
 - ___ Council Member Lee Parrish
 - ___ Mayor Gordon VanCamp
3. JUDGE HOWARD NORDECK WILL ADMINISTER THE OATH OF OFFICE TO NEW COUNCIL MEMBER JIM BATEMAN
4. CALL TO THE PUBLIC
At this time, any member of the public is allowed to address the Town Council on any issue not already on tonight's agenda. Pursuant to the Arizona Meeting Law, the speaker's comments may not be considered, discussed or even answered by the Council at this meeting but may, at the discretion of the Town, be placed on a future agenda for discussion/action.
5. APPROVAL OF MINUTES
 - a. October 8, 1998
6. COMMITTEE REPORTS/OTHER REPORTS
 - a. Rural Metro/Corey Reed, Assistant Public Information Officer
7. CONSENT AGENDA-ITEM A THROUGH D
Matters listed under the Consent Agenda are considered to be routine and will be enacted by one motion and one vote. There will be no separate discussion of these items. If discussion is desired by members of the governing body, that item will be removed from the Consent Agenda and will be considered separately.
 - A. CANCELLATION OF NOVEMBER 26 AND DECEMBER 24, 1998 MEETINGS
Cancellation of the November 26 and December 24, 1998 meetings due to the Thanksgiving and Christmas holidays.
 - B. ORDINANCE 1998-15, AMENDMENT TO THE TOWN OF SAHUARITA TOWN CODE, CHAPTER 9, "FEES".
Approval of Ordinance 1998-15 amending the code of the Town of Sahuarita by amending Chapter 9, "Fees" to include fees for special permits under the Noise and Nuisance Chapter (14) of the Town Code.
 - C. RESOLUTION 1998-34, DESIGNATING A PORTION OF ABREGO DRIVE AS A COUNTY ROAD
Approval of the designation of the portion of Abrego Drive that is within the Town Limits as a County Road for approval of funding for certain roadway improvements.

D. RESOLUTION 1998-35, APPROVAL OF AN INTERGOVERNMENTAL AGREEMENT WITH PIMA COUNTY FOR ACCESS TO BOND FUNDS FOR ROADWAY IMPROVEMENTS ON ABREGO DRIVE

Approval of Resolution 1998-34, entering into an IGA with Pima County to access bond funds for roadway and drainage improvements on the extension of Abrego Drive.

E. TRANSFER OF FUNDS

The Police Department has gone over their allotted budget in Travel and Training. This allow us to transfer funds from within the Police Department Budget to cover the overage.

8. PUBLIC HEARING, ORDINANCE 1998-14, THE HENNESSY GROUP LLC. REZONING OF PROPERTY LOCATED AT I-19 AND DUVAL MINE ROAD FROM GR-1 TO CB-2.

Public hearing, discussion and possible action on Ordinance 1998-14, which is a request from the Hennesy Group LLC. to rezone approximately 14.7 acres from zone GR-1 (Rural Residential) to Zone CB-2 (General Business), located at the southwest corner of I-19 and Duval Mine Road. The proposed use is for commercial development in conformance with the Sahuarita General Plan.

RESOLUTION 1998-33, AUTHORIZING THE TOWN TO ENTER INTO A DEVELOPMENT AGREEMENT WITH THE HENNESSY GROUP LLC. FOR THE DEDICATION AND CONSTRUCTION OF RIGHT OF WAY IN THE AREA OF DUVAL MINE ROAD AND I-19

Discussion and possible action on Resolution 1998-33, authorizing the Town to enter into a development agreement with the Hennesy Group LLC. for the dedication and construction of approximately .57 acres of right of way in the area of I-19 and Duval Mine Road.

10. DISCUSSION RELATING TO FRANCHISE AGREEMENTS

Information item on how the Town can franchise various service industries. This information is in response to questions from the Council relating to this issue. No action is anticipated, but could be placed on a future agenda for further discussion or action.

11. RECOMMENDATION BY WASTE WATER COMMITTEE ON TREATMENT PROCESS.

Discussion and action regarding the process to be used in the design of the Waste Water Treatment Plant.

12. COUNCIL ACTION ON THE U.S. FISH AND WILDLIFE SERVICE'S PROPOSED LANDOWNER GUIDANCE AND SURVEY PROTOCOL FOR THE CACTUS FERRUGINOUS PYGMY OWL.

Discussion and possible action on commenting on the U.S. Fish & Wildlife Service's Proposed Landowner Guidance and Survey Protocol for the Cactus Ferruginous Pygmy Owl.

13. COUNCIL ACTION ON THE PROPOSED COMMITTEE TO CREATE A REGIONAL DESERT HABITAT CONSERVATION PLAN

Discussion and possible action on whether the Town should participate in the proposed committee to create a Section 10 (of the Endangered Species Act) Regional Desert Habitat Conservation Plan for the protection of endangered species as proposed by Pima County.

14. COUNCIL APPROVAL OF THE CFD APPRAISER

Discussion and possible action to approve the appraiser chosen by staff to perform the appraisal on the Rancho Sahuarita Development.

15. ORDINANCE 1998-16, AMENDING THE SAHUARITA TOWN CODE, CHAPTER 2, ARTICLE 2-4 "COUNCIL PROCEDURE"

Discussion and possible action on Ordinance 1998-16, amending Chapter 2, Article 2-4 of the Sahuarita Town Code, Section 2-4-1, B, to change the regular meeting location from the Sahuarita School Auditorium located at 350 West Sahuarita Road to the La Joya Verde Recreation Center, 2549 North Camino Reloj, unless otherwise announced.

3501 S. Saguaro Shadows Drive
Tucson, Arizona 85730
November 12, 1998

Ms. Maeveen Behan
Pima County Administrative Office
130 W. Congress
Tucson, Az. 85701-1317

Re: Application for appointment to Steering Committee relating to development of multi species habitat conservation plan

Dear Maeveen,

Your presentation at the luncheon organized by Mike Zimet was most impressive. It obviously will be an honor to be a member of your team to develop, and hopefully gain support for, a plan that will protect present and future endangered wildlife, habitat and humans in our region. Optimistically, the final plan will become a model that promotes, in-so-far as possible, a design for the protection and promotion of the co-existence of humans and wildlife nationwide.

While I was a child living in a very small town, surrounded by farms, in North Carolina, my home was never without animals. Some were/had been the sick farm animals brought to town for special care; others were/had been wildlife babies found by loggers or persons who knew our place was a haven for animals in need.

My formal education includes a degree in journalism, with a minor in recreation from the University of North Carolina; a master's degree in Human Development with a minor in elementary education from the University of Maryland; and advanced studies at the University of Arizona and NAU. My classes at the U. of Md. and here in Arizona included many environmental education classes.

As a member of the Arizona Classroom Teachers Association, I organized classes for teachers in many facets of environmental education, including conservation of natural resources, use of the national forest, and environmental problems and solutions. These classes were coordinated with instructions being given by the members of the Agricultural College, Desert Museum, U.S. Forest Service, Arizona Game and Fish Department, and the Departments of Elementary and Secondary Education at the U. of Az.

The Tucson area has experienced a lot of growing pains since our arrival from Iran in 1969. In 1985, having retired from the Tanque Verde School District, I moved close to the Saguaro National Park (east) so that I could enjoy observing wildlife on our property.

My community involvement has included:

- (1) participation in getting legislation passed that permitted property owners in 150 square miles to withdraw from fire district annexations,
- (2) changing annexation laws to require 51% of property owners' approval,
- (3) participation in the process to pass a law to ban leg hold traps in Arizona,
- (4) docent for school groups at Saguaro National Park (east),

- (5) organizing and implementing a covenant project in which 62% of the property owners participated, protecting the one mile west of the Park, between Broadway and Escalante. This was under the auspices of the Saguaro Forest Associates.
- (6) organizing, as a board member of SFA, programs with experts, and trips that informed and promoted knowledge and understanding of vegetation and wildlife living in and around the park, as well as the expansion area in the Rincon Valley
- (7) obtaining postal service and "legalization" for Pistol Hill Rd. residents
- (8) participation in the Catalina Area plan of the 1980's
- (9) membership on the Catalina Area Comprehensive Plan committee
- (10) attending Rincon Area Comprehensive Plan meetings, as well as numerous meetings and hearing for plans involving public or private lands in the Rincon Valley

Research on the history of Pistol Hill Road (in the Rincon Valley) during the "road legalization attempt" led to the discovery of the organization and purposes of the Forest Service; the private ownerships on the Rincons (the shortlived Mannings Camp & Spud Rock, for example, which were "obtained" from the owners by the governments after a few years), and the way of life of ranchers and farmers in the Tanque Verde and Rincon Valley area; stories of Indian raids, pursuit by soldiers, letters from stage coach travelers, cattle drivers, miners etc... These letters mention places like the marsh near Davidson Canyon (Cienega Creek) that show us the evolution of change of habitat since the late 1800's. The past is invaluable in helping predict possible evolutionary events of the future. The writings were of observations and events that occurred as a result of earthquakes, droughts, floods and fires. A rancher wrote of the almost complete destruction of mesquite trees in the Vail Valley which had been cut to supply the needs of Tucson; another sited the fact that certain cacti were not prevalent until after the drought of the 1880s....To plan for the future protection of any species, knowledge must be gained of its requirements for survival and its place in the food chain. We must have as much knowledge as possible about its past....

As mentioned before, wildlife and its habitat have been a life long interest and love. It is for that reason that most of the property we own is located in areas rich with wildlife. It is my understanding that a forest service "owl expert" has identified a pygmy owl near Papago Springs. We have property in the vicinity. I therefore, am interested in becoming a member of the steering committee not only as a property owner, but as a wildlife conservationist.

Thank you for taking the time to read this lengthy letter. I wrote, perhaps too extensively, of personal experiences that might be of value in assisting the county and steering committee in reaching a very difficult goal; a working and "testable through observations" plan for profitable coexistence for humans and wildlife. I hope you will consider my application.

Sincerely yours,



Ellen D. Barnes
Phone 296-4561

11-29

My attachment to the
Santa Cruz River Restoration Conference
Participant's Comment Form

Submitted by: Kenn Schultz, 6161 E. 4th St., Tucson, AZ 85711-1613
Phone: 745-1820; Email: mkassocs@azstarnet.com

1. How would I like the Santa Cruz River to look in the future?

a. Where possible, I would like to see a river with water running in it, traversing a broad flood plain, supporting native plant and animal life. However, since I am rather familiar with the river (the U.S. portion) from its partial headwaters at Bog Hole Springs in the San Rafael, past the Little Red School House near Nogales, past Guevavi, Calabasas, Tumacacori, Tubac, Canoa, San Xavier, to Tucson, I can't envision much of my primary vision becoming a reality because of competing "human interests and requirements."

b. As a more realistic alternative, I would like to see a river that flows, frequently enough, to support native plant life in its river bed and native plants along its former floodplain (obviously supported by "imported water"). The constructed "acéquia" that flows (or at least did) from Congress to Mission Lane (the Convento Site) along with its "imported water" for its adjacent plant community has demonstrated the feasibility of restoring native plant life with some water and TLC, when done correctly. In other words ... I would like to see a ribbon of GREEN wherever it is possible.

c. Thirdly, I would like to see a Santa Cruz River that has sufficient interpretive signs and displays that provide both residents and tourists alike with a "sense of history - a sense of place - a sense of awe, or even reverence, for where they are."

2. How can this be done?

a. By Political Will (vision, cooperation and \$).

b. By Citizen Will (vision, cooperation and \$).

c. By Private Interests (interest, and \$ from "what's in it for me?").

d. By Nonprofit Interests (interest, and \$ from "what's in it for me AND us?").

3. Specific projects along the Santa Cruz River I would like to see implemented:

a. I am in complete support of the "*Paseo de las Inglesias*" Plan.

b. I really like and support Pima County's (Chuck Huckelberry and staff) *Sonoran Desert Conservation Plan*. Obviously, priorities will have to be established (in a nonpolitical way) to begin implementation. Unfortunately, this prioritization was never really done with the Pima County Open Space Committee's Report and Chuck Huckelberry's Supplemental Report in the late 1980's, and so the selection of which open space parcels to obtain, and when, became VERY political.

c. My number one priority Santa Cruz River Project is replication (can't restore what not there any more) of the San Agustín de Tucson Mission Complex, to include archaeological interpretation facilities of the Archaic, Hohokam and O'odham Cultures that occupied the area, and the Spanish and Mexican Periods too.

Michael Zimet
2122 N. Craycroft Road, #116
Tucson AZ 85712
520/886-3982 Phone
520/886-9868 Fax

November 16, 1998

Chuck Huckelberry
Pima County Administrator
130 N. Congress
Tucson AZ 85701

re: Pima County's proposed "Steering Committee" as called for in *The Endangered Species Habitat Conservation Handbook*

Dear Chuck:

I am one of the original founders of the Pima County Private Property Rights Association, and am currently serving as the Treasurer of that organization.

As part of my responsibilities with that organization, I have been working with the Pima County administrative staff, the board of supervisors, certain state legislators, the environmentalist community, various property owners and certain members of the real estate community, all in an attempt to get the concerned stakeholders to jointly address future land-use planning needs.

I am well qualified to be a member of subject Steering Committee because of my considerable experience in real estate investment, development and finance, as well as my deep concern for doing what's right socially, economically and politically for our precious real estate here in Pima County.

Chuck, I hereby formally request that I be appointed to serve on subject Steering Committee, which, I hope, will be most helpful in pinpointing the revisions that are needed to Pima County's "Comprehensive Plan."

Thank you for your courtesy and consideration.

Very truly yours,



cc: Sharon Bronson, District 3 Supervisor



7650 E. Broadway Blvd.
Suite 203
Tucson, AZ 85710
Telephone (520) 290-0828
FAX (520) 290-0969
soncran@sonoran.org
www.sonoran.org

Sonoran Institute

November 17, 1998

C.H. Huckelberry
County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, AZ 85701-1317
RE: Pima County Sonoran Desert Conservation Plan

Dear Mr. Huckelberry:

We appreciate the copy of the Pima County Sonoran Desert Conservation Plan.

We are delighted with the plan as a whole and would like to commend those who were involved in its preparation. This plan provides a visionary step forward for Pima County and an excellent framework for open space protection efforts.

We are currently giving a careful review to the specific recommendations for conservation in the Rincon Valley. The Sonoran Institute and Rincon Institute are working with a team of biologists, cartographers and residents; we may suggest some revisions to the proposed expansion of Colossal Cave Mountain Park based on this fine-toothed analysis of the Rincon Valley. We will submit these comments by the end of December, 1998.

Again, we commend you and Pima County for your excellent work, and look forward to working with you to implement this plan.

Sincerely,

Luther Propst
Executive Director
Sonoran Institute

cc: Maeveen Behan

11/17/98

C. H. Huckelberry, County Administrator
130 W. Congress
Tucson, AZ 85701-1317

Dear Mr. Huckelberry:

We have read your comprehensive proposal "Sonoran Desert Conservation Plan". The plan is a short and long range view of what we need to do in Pima County. We need to save beautiful desert areas and irreplaceable plants and streams. We wish to preserve this precious desert for our children, grandchildren and future generations.

This will give the developers in the future an opportunity to sell their housing areas under conditions that give owners a wonderful opportunity to enjoy a little open space, a little breathing room and recreation for good health in an area with sunshine and a small amount of rainfall.

You and your staff are to be complimented for the vision and most of all a blueprint--a path that we should travel on to create a continued good life style for those who choose to come here in the future. We hope the final blueprint remains as written in your plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed and Margaret Bieber". The signature is written in dark ink and is positioned above the typed name.

Ed and Margaret Bieber

1342 Paseo Del Cervato
Green Valley. AZ 85614

Mark E. Miller
3814 E. Pima
Tucson, AZ 85716

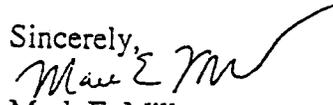
November 17, 1998

Mr. Chuck Huckelberry
County Administrator
Tucson, AZ 85721

Dear Mr. Huckelberry:

I am writing to commend you on your efforts and plans under the Sonoran Desert Conservation Plan. Like many others, I came to Tucson partly because of the stunning mountains and deserts. It is nice someone is doing something to help preserve natural areas before they fall to high-density developments. I only have to look at my early home near Tangerine and Thornydale to see the benefits of low-density development versus the current trend toward suburbia tract homes that has made that area a virtual traffic nightmare. Open space is vital to quality of life. Thanks for helping to preserve this before it is gone.

Sincerely,


Mark E. Miller



TOWN OF ORO VALLEY
11000 N. LA CAÑADA DRIVE
ORO VALLEY, ARIZONA 85737
Administrative Offices (520) 297-2591 Fax (520) 297-0423

November 18, 1998

C.H. Huckelberry, County Administrator
County Administrator's Office
Pima County Governmental Center
130 West Congress
Tucson, Arizona 85701-1317

Dear Mr. Huckelberry:

Thank you for the opportunity to review and comment on the Sonoran Desert Conservation Plan. The Town of Oro Valley has evaluated the draft Sonoran Desert Conservation Plan against the General Plan Land Use Plan and Policies and finds that the Plan conforms to the goals and policy directions as described in several elements throughout the General Plan.

The first goal identified in the land use element is to "Preserve Oro Valley's natural Sonoran Desert environment and scenic resources, which are an important part of the community's quality of life." The proposed Plan clearly incorporates this goal within the six elements described.

The Plan in combining short-term actions to protect and enhance the natural environment with long-range planning to ensure that the natural and urban environments not only coexist but develop an interdependent relationship, where one enhances the other mirrors the Town's Core Community Goal "to accommodate growth in an orderly, environmentally sound manner while providing for the integration the manmade with the Sonoran Desert environment."

Future projects indicated under Riparian Restoration such as the Cañada Del Oro (CDO) Recharge project supports the goals and policies identified in the natural Resource Conservation element. Specifically, by protecting the Planning Area's natural attributes, which have been designated as a key community value (Goal 8.1), and maintaining and enhancing indigenous (native desert) vegetation and riparian habitats where possible (Policy 8.1G).

The Mountain Park element, specifically with regards to the Tortolita Mountain Park (both past and present projects) encourages a natural open space connection to and the expansion of Tortolita Mountain Park (Policy 6.2C). Additionally, the Town's General Plan recommends that "strategies that would enable preservation of lands extending north and west from Honey Bee Canyon/Sausalito Creek and connecting to the Tortolita Mountain Parks through independent methods and through coordination with Pima County, Arizona State Land Department, and/or any nationally recognized conservation organization."

Both the Riparian Restoration and the Mountain Park elements support many of the goals and policies indicated in the Park, Open Space, and Recreation Element. Both support in developing an integrated parks, open space, and trails system that will promote a sense of community identity and high quality of life for the residents as well as wildlife habitat and movement corridors. Each provides for an interconnected multi-use trail system that provides for hiking, biking, and equestrian users along with protecting existing and establishing new trail access points to major washes and regional preserves.

In conclusion, staff finds the Plan to be in conformance with the Town's General Plan and supports adoption of the Sonoran Desert Conservation Plan.

Once again, thank you for the opportunity to review and comment on the draft Plan. If you have any questions or require further clarification, please contact me.

Sincerely,



Chuck Sweet
Town Manager

C: MAYOR & TOWN COUNCIL
DON CHATFIELD, COMMUNITY DEVELOPMENT DIRECTOR

ECOLOGICAL
RESTORATION AND
MANAGEMENT
ASSOCIATES, division of
Copper Cactus Landscape
Company, Inc.

8987 E. Tanque Verde, #309-317
Tucson, AZ 85749-9399
(520) 749-5403

November 19, 1998

To: Chuck Huckelberry, Pima Co. Administrator
130 West Congress 10th Floor - SDCP
Tucson, AZ 85701

From: Michael H. Winn, M.S.

Re: Regional multi-species conservation planning effort

I would be very interested in participating in the planning process which will eventually produce a regional multi-species conservation plan. I have lived in the metropolitan Tucson area most of my life. I am very familiar with Sonoran Desert ecosystems.

Ecological Restoration and Management Associates (my company) holds a permit from the U.S.F.W.S. to survey for the endangered pigmy owl. In addition to endangered species surveys, we offer several other services (see attached corporate statement of qualifications). I would be happy to serve on any of the groups listed in your letter to Pima Co. Residents regarding the Sonoran Desert Conservation Plan (steering committee, advisory panel or workgroup).

Please feel free to call me at 749-5403 or send a fax to 749-3304 if you would like me to work on any of the committees or need additional information.

Sincerely,



Michael H. Winn

cc: Maeveen Behan

ERMA

ECOLOGICAL
RESTORATION AND
MANAGEMENT
ASSOCIATES, division of
Copper Cactus Landscape
Company, Inc.

8987 E. Tanque Verde, #309-317
Tucson, AZ 85749-9399
(520) 749-5403

CORPORATE STATEMENT OF QUALIFICATIONS

Ecological Restoration and Management Associates (ERMA) is a company comprised of qualified associates with training and experience in a number of fields related to Wildlands Conservation and Management. We provide consulting and construction services in the following areas:

Wildlife Management (Including endangered species surveys.)

Ecological Restoration (Including rehabilitation of existing ecosystems and construction of new ecosystems, such as wildlife habitat and constructed wetlands.)

Forestry and Rangeland Ecology -(Including inventory, site assessment, and management.)

Native Plant Based Landscape Design (Including parks, streetscapes, commercial buildings.)

Education (Including workshops, seminars, and on site training of corporate employees in conservation based subjects.)

Each associate holds at least a Bachelors Degree in conservation related fields. The owner holds a Master of Science Degree in Rangeland Ecology. The company is licensed by the U.S. Fish and Wildlife Service to survey for Pygmy Owls. The owner will personally see that proper levels of attention are given to each project.

Michael H. Winn, M.S.
Owner/President

ERMA

November 20, 1998

✓ Mr. Charles Huckleberry
County Administrator
PIMA COUNTY GOVERNMENT
130 West Congress Street
Tucson, Arizona 85701

Mr. Dan Felix
Director
PIMA COUNTY PARKS & RECREATION
1204 West Silverlake Road
Tucson, Arizona 85713

Re: Santa Rita Experimental Range

Gentlemen:

Recent news reports have indicated that a portion of the Santa Rita Experimental Range has been earmarked for county acquisition as a future public park.

Dean Colin Kaltenbach, director of the University of Arizona's Agricultural Experiment Station, has asked me to call to your attention the 1988 actions of the U.S. Congress (Public Law 100-696, Title V) and the Arizona Legislature (1988 Arizona Session Laws, Chapter 76). Under these enactments, the Santa Rita Experimental Range is owned by the State of Arizona, as part of the land grants for support of the university established under the Enabling Act and the Arizona Constitution. The legislature has specifically directed that these lands be

". . . assign[ed] . . . to the university of Arizona for use for ecological and rangeland research purposes. This use shall continue until such time as the legislature determines that the research use can be terminated on all or part of the lands."

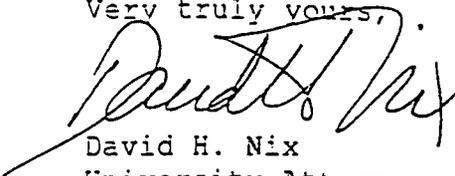
These actions appear to have assured the continued status of the Santa Rita Experimental Range as open space consistent with the vision of the Sonoran Desert Conservation Plan.



Mr. Charles Huckleberry
Mr. Dan Felix
November 20, 1998
Page 2

Please let me know if you have any questions or require further information.

Very truly yours,



David H. Nix
University Attorney

Enclosures:

P.L. 100-696, Title V (102 Stat. 4593-4595)
1988 Ariz. Sess. L., Ch. 176

cc: Colin Kaltenbach

Tucson Estates, Az.
Nov. 20 - 1998

Dear Sir,
Just want you to
know, I am in favor of the
Sonoran Desert Conservation Plan.
Please, let us keep what's left
of our precious desert in
Pima County.

Thank you -
Sincerely,

Aurelia Acton
5801 W. Lazy S"
Tucson, Az. 85713



JEANIE MARION
3046 S. CARMONA PLACE
TUCSON, ARIZONA 85713-4309

Chuck Huckleberry
Pima County Administrator
130 West Congress Street
Tucson, Arizona 85701

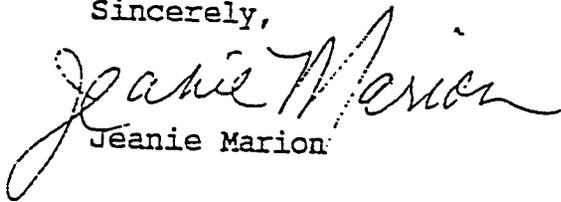
November 20, 1998

Dear Mr. Huckleberry:

I am writing in support of your proposed Sonoran Desert Conservation Plan. I feel that it is extremely important to protect our open space in order to preserve the quality of life which we in Pima County currently enjoy, and I am extremely pleased that you and your staff have taken the time and effort to draw up such a comprehensive plan.

Thank you for all the work which went into developing the plan. I hope that the County Supervisors will feel, as I do, that this plan is essential for the future of Pima County.

Sincerely,


Jeanie Marion

November 22, 1998

Mr. Charles Huckeberry
County Administrator

Subject: Sonoran Desert Conservation Plan

Dear Mr. Huckeberry,

It was very interesting to read of your plans to surround Tucson with many more parks. What a great thing it would be if this happened.

Can you tell me what the chances are that your plans are feasible, or is it just an idea that will be forgotten or killed for political reasons?

I sure hope you can make it happen.

Best,



Graham Barton
14508 N. Lost Arrow
Tucson, AZ 85737

By Others

Chuck Huckelberry
Pima County Administrator
130 W. Congress
Tucson, Arizona 85701

November 23, 1998

Dear Mr. Huckelberry,

Pima County's Desert Conservation Plan is a giant step in the right direction. I am interested in the multi-species conservation of the critical habitat and wish to take part in the conservation effort.

At the meetings of the Enchanted Hills Neighborhood Association a number of long time residents speak wistfully of the dwindling number of desert animals that are seen in the area. They remember an abundance of wild life when they moved into the neighborhood and rarely see the animals now. Members are ready to seek ways to bring them back. The multi-species Conservation Plan is arriving just in time.

Yours Truly,

John Bordenave
JOHN BORDENAVE

1912 W. Caravelle Rd.
Tucson, Arizona 85713-4514

PH. 903-2152

Brian and Karen Metcalf
3450 S. Jamie
Tucson Az. 85735
Tel. 883-1543

November 23, 1998

Mr. Huckleberry:

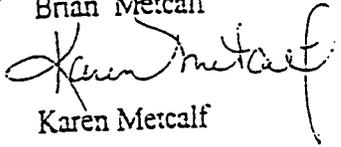
I am writing this letter as a public comment on your proposed Sonoran Desert Conservation Plan. I fully endorse it and urge you to press ahead full speed in securing its passage by the Board.

In general terms, I see this as Pima County government's first real, long term, regional, and biologically based plan for a healthy and environmentally sustainable future. I am particularly heartened by its scope, not only in terms of the physical amount of land covered but also in terms of its expansive sense of time. It properly balances our responsibilities to future generations with our present needs. It also acknowledges the value of past generations in our lives today by protecting the historical artifacts of the Spanish-Mexican, Native American, and prehistoric peoples who lived here before us. Finally, it recognizes the vital importance of biological diversity by preserving wildlife and plant corridors across Pima County.

In specific terms, I firmly believe that there is a social, economic, and quality of life cost to urban sprawl. It reduces the quality of human relationships through increased anonymity and impersonalization. It imposes heavy financial costs in terms of new infrastructure needs like roads, schools, police, courts, etc. It reduces air quality and depletes a shrinking water supply. Therefore, in addition to my general support of the plan, I specifically support: (1) the proposed freeze on upzonings and (2) the creation of a preservation fund based on the imposition of new and higher impact fees on new development.

Finally, the cost of this plan is still undetermined. Although you should emphasize cost free measures like no upzonings and tougher standards for extensions of time for rezonings that are expiring, I am willing to pay more taxes to achieve the goals of the plan. I believe that most other people would be willing to do so as well. Taxation is only a burden when the public can not see what it gets in return. That would not happen with preservation of open space and the creation of county parks. Thank you.


Brian Metcalf


Karen Metcalf



Lan Lester, *Mayor*
Steven Shochat, *Vice-Mayor*
Cariotta "Scottie" Bidegain, *Council*
Eaine Cooper, *Council*
Kathleen Franzl, *Council*
Alan Lathram, *Council*
Barbara Smith, *Council*

Dear Mr. Huckelberry:

As per your request, here is a compilation of some of the comments and suggestions that have been brought to the attention of the Tortolita Town Council in the weeks since the publication of the Draft SDPP. Also included is a copy of the resolution R1998-05, adopted unanimously by the Tortolita Town Council on November 23, 1998 in support of the Draft Plan. We expect that the process ahead will provide many points of public input which will allow for the elaboration of many of these and similar comments.

The Council would also like to strongly endorse Mayor Lan Lester for an appointment to the Sonoran Dessert Protection Plan's volunteer steering committee, in light of his strong background in the biological sciences, open space committee work, neighborhood coalition involvement etc. We would hope that your office will seriously consider him as an active planner in the process.

1. The plan is indeed farsighted, ambitious, and revolutionary. The hopes from all commentors is that it will succeed to the best of its potential.
2. Wild Burro Canyon's mouth has been left unprotected, and the proximity of it to Dove Mountain puts it, and hence the rest of the protected portions of the Canyon at great risk.
3. There is a sense that we will never see any "Growing Smarter" monies in Pima County, and there is a question as to whether or not API funds will ever be available to us as well. The suggestion is to aggressively seek out other funding sources, public and private, for acquisitions. and act as if none of those other funds were accessible.
4. There is a marked omission of any connectivity between the Northern and the Western reaches of the valley. Specifically connecting the Tortolita Mountain western bajada with the Tucson Mountains. There needs to be a similar corridor to the one proposed between Tortolita Mountain Park and Catalina State Park. We propose some connectivity from TMP to the Tucson Mountain Park on the west.
5. We propose the county maintain a hold on zoning levels in prime pygmy owl/iron-wood forest habitats which are compatible with pygmy owl survival, i.e. densities of SR

or less.

6. Inviting Native American Tribal Participation in planning their prior homeland's future, truly invites participation of all segments of the community.
7. What is the justification behind the need for ANOTHER 18 hole golf course either in the Tucson Diversion Channel OR the Jullian Wash?
8. Why is the Rincon Creek Restoration Area limited to only a 2 mile restoration?
9. "All lands within designated mountain parks, riparian zones or ranches designated for conservation should not be rezoned to uses greater than what is now permitted."
10. Require as an acid test, that any conditional use applications not have a detrimental effect on an area designated as being environmentally sensitive.
11. The "Environmental Enhancement Fee" could be higher, to allow the profiting developers to spread out and absorb more of the costs of growth, and reducing the burden on existing residents.

We heartily congratulate you on your bold position. It has been said that nothing is more powerful than an idea whose time has come. The responsible stewardship of our natural environment will become the primary focus of our society in the next century and we are proud that you have taken a stand to lead the way.

If we can be of any assistance in the near future please don't hesitate to call. Mayor Lester will not likely be back in town until after the New Year. My telephone # is 797-0830, and my fax is the same. E-mail is Drsteve@azstarnet.com

Congratulations again,

Steven Shochat, Vice Mayor

for the Town Council of Tortolita, AZ

RESOLUTION (R)1998-05

A RESOLUTION OF THE MAYOR AND COMMON COUNCIL OF THE TOWN OF TORTOLITA, PIMA COUNTY, ARIZONA in acknowledgement and support of the principles and direction of the Sonoran Desert Protection Plan.

WHEREAS, The Town of Tortolita was founded in large part around the principles of responsible growth and environmental preservation, and;

WHEREAS, the fragile resources associated with the Sonoran Desert are disappearing at an ever alarming rate, and;

WHEREAS, there is a significant evidence that the growth and development community can not effectively institute long range planning with environmental and conservation sensitivity without administrative guidance, and;

WHEREAS, there is an immediate need for specific, thoughtful, far-sighted and ambitious action to preserve our natural heritage for future generations, and;

WHEREAS, the Sonoran Desert Protection Plan represents an effort on the part of all of the communities of interest involved with land use projects and planning, and;

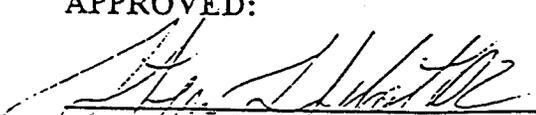
WHEREAS, the Town of Tortolita's jurisdictional boundaries form the virtual center of the Northern portion of the planning area, and "Ground Zero" for the Ironwood Forest, and Cactus Ferruginous Pygmy Owl Habitat,

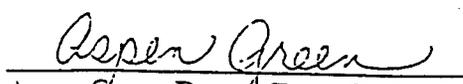
NOW THEREFORE BE IT RESOLVED, that the Town of Tortolita, Pima County, Arizona, does hereby affirm and acknowledge its vigorous support for the principles and directions underlying the draft report; offers its help to the County in whatever ways are appropriate; and will solicit and assemble for the County administrator's pleasure a list of specific comments concerns and suggestions to help make the proposed SDPP an even better plan that could be a model for shaping preservation throughout the nation.

PASSED AND ADOPTED by the Town Council of the Town of Tortolita, Pima County, Arizona this 23th day of November, 1998.

APPROVED:

ATTEST:


Steven Shochat, Vice-Mayor


Aspen Green, Deputy Town Clerk

APPROVED AS TO FORM:

Town Attorney



File Code: 2610

Date: November 24, 1998

C. H. Huckelberry
County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, AZ 85701

Dear Mr. Huckelberry:

Thank you for the opportunity to review the Sonoran Desert Conservation Plan. We support the concept and appreciate the outstanding work your office has undertaken to accomplish this effort. The comments that follow are presented by plan element.

Ranch Conservation

At least two of the ranches identified for conservation have grazing privileges on National Forest system land. It is likely that the base property requirement (40 acres plus livestock handling facilities) for these privileges is tied to land in the area identified for conservation. We are thus particularly interested in working with you on any action that may involve these properties.

Historic and Cultural Preservation

We wish to note that Catalina State Park is located on National Forest system land and operates under a special use permit issued by the Coronado National Forest. The Romero ruin is thus located on Forest land and subject to regulation and management accordingly.

We suggest the addition of Kentucky Camp for consideration as an additional site for preservation. Kentucky Camp is located (map enclosed) in the Coronado National Forest. This mining ghost town is undergoing a revival through partnerships between the Forest Service, the Friends of Kentucky Camp, and individual volunteers. Constructed in 1904, Kentucky Camp housed the managers of a placer mining operation in Boston Gulch, and is slowly being restored to its original appearance. Visitors have the opportunity to learn about the colorful history of the Greaterville Mining District, and the more adventurous can hike the Arizona Trail, which runs along sections of the ditch constructed to bring water to the mines.

Riparian Restoration

Some of the riparian areas noted for restoration and protection originate on National Forest system land. Sabino Creek is an example and here we are looking at a renovation proposal to



protect native fish species. We would like to coordinate with you on this and other stream systems and riparian areas, as appropriate.

Mountain Parks

Several of the parks mentioned abut National Forest system land and thus we would like to coordinate with you on some of the projects identified such as trail development, bird watching, equestrian routes, etc.

Habitat, Biological, and Ecological Corridor Conservation

We believe this is an extremely important element to help maintain viable wildlife and plant populations. We have information in our geographical information system that may assist in this effort which we will be glad to share with you.

Critical and Sensitive Habitat

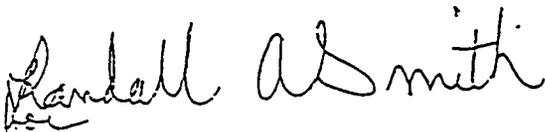
We support the proposal to develop a multi-species habitat conservation plan to provide long term protection for threatened, endangered and sensitive species and thus would like to coordinate with you in this undertaking also.

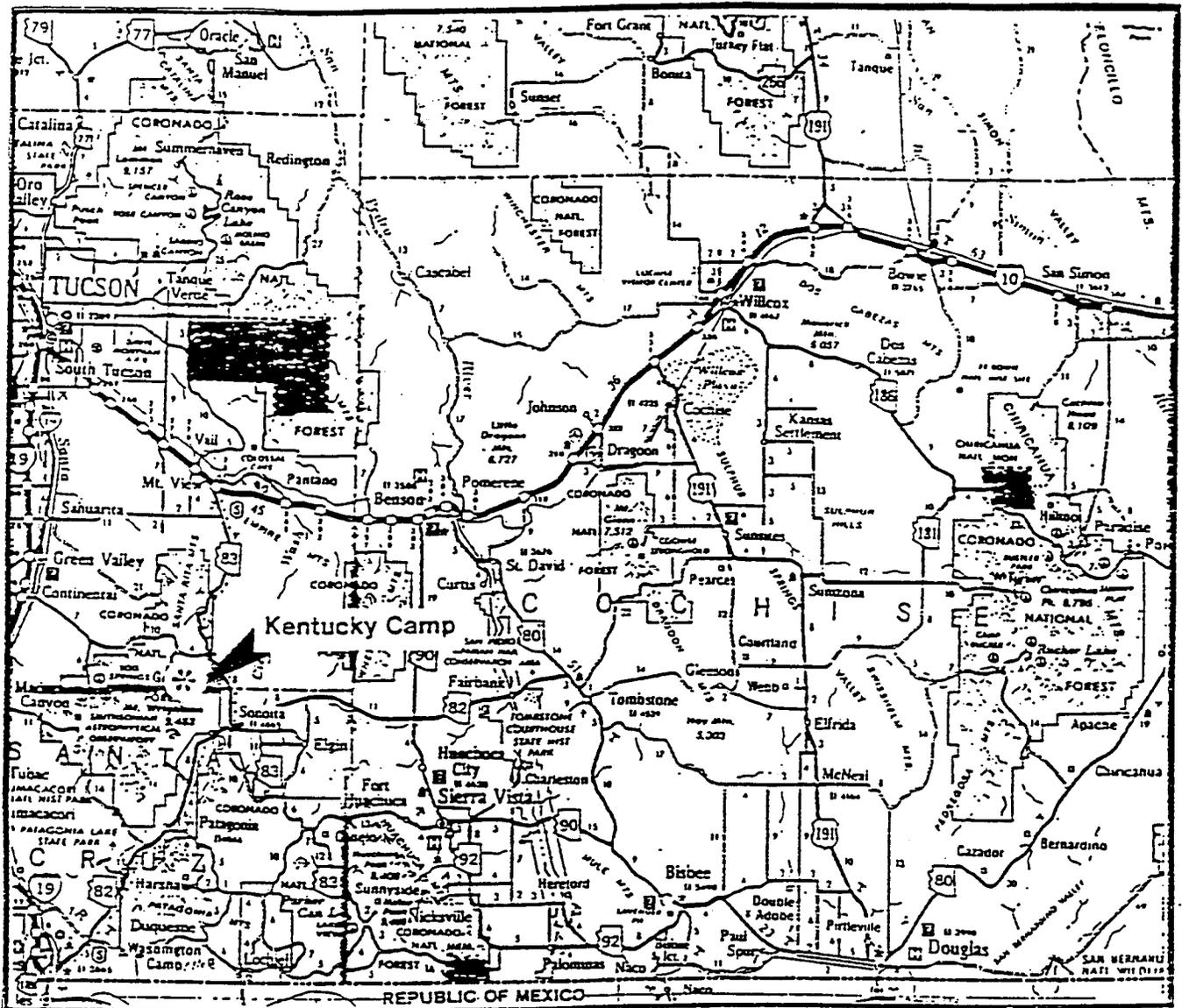
We recently initiated a challenge cost-share agreement with the Arizona Game and Fish Department to provide for more information and better management of the cactus ferruginous pygmy owl. It provides for the funding of surveys, habitat sampling and assessment, nest site monitoring, owl pellet analysis to determine prey items, and training in survey protocol. We anticipate this will help us to better understand the owl's needs and lead to better management.

There is a mistake in Figure 3. The Santa Catalina Ranger District is color coded yellow, as BLM land, whereas it should be colored green for National Forest system land.

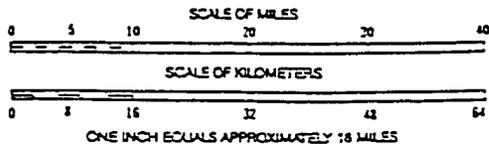
We have initiated the review and revision process for the Coronado National Forest's Land and Resource Management Plan and thus the timing is good to coordinate with you on your development of a long term ecosystem based conservation plan. We look forward to working with you as partners in this effort.

Sincerely,

acting for

JOHN M. MCGEE
Forest Supervisor



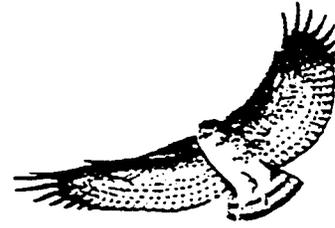
Kentucky Camp
 Coronado National Forest



Adapted from Arizona Travel Map,
 Arizona Highways 1993

Enlarged area

Southwest Center
for
Biological Diversity



protecting and restoring the southwest's deserts, rivers, forests, and wildlife

Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

November 24, 1998

Re: Sonoran Desert Protection Plan / MSCP Steering Committee

Dear Mr. Huckelberry:

It is my understanding that you are now in the process of forming a Steering Committee to coordinate development of a regional multiple species conservation program here in Pima County. As you know, the Southwest Center has worked closely with the Coalition for the Sonoran Desert Protection Plan and representatives of the County in an effort to ensure regional protection of the pygmy-owl and other sensitive natural resources. With this letter, I wish to convey interest by the Center in formal participation on this Steering Committee.

Please contact me at 623-5252 x.307 if you have any questions regarding this letter. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "David Hogan". The signature is fluid and cursive, written over a horizontal line.

David Hogan

Southern Arizona Leadership Council

November 24, 1998

Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress St., 10th Floor
Tucson, Arizona 85711

Ref: Sonoran Desert Conservation Plan

Dear Mr. Huckelberry:

Thank you for allowing the Southern Arizona Leadership Council the opportunity to review and comment on the Sonoran Desert Conservation Plan. We strongly support the preservation goals as set forth in the Plan and the innovative process it provides.

We endorse the concept of inclusive planning to identify environmentally sensitive public lands to be set aside for future generations to enjoy and the identification of environmentally sensitive private lands to be acquired through cooperative means. We look favorably on this Plan because of the protection it provides our quality of life and the potential it has to clarify and define opportunities for economic development. Although it is unclear, we assume and recommend that the Plan clarify that once these fragile areas are set aside the balance of the lands will be available for development.

The implementation of the Sonoran Desert Conservation Plan must be considered in the context of all other county programs and prioritized accordingly. Prior to implementation of the Plan an economic impact assessment should be completed to insure that the Plan will not result in increased property taxes and/or the diversion of funds away from other important projects and programs that need to be funded by the county.

The Southern Arizona Leadership Council is committed to working with the County in finding creative funding sources for this Plan that eliminate the need for new local taxes. However with one of the highest county property tax rates in Arizona, we would oppose this Plan if it would require new local taxes or fees to be paid by property owners.

The Plan has the potential for bringing this community together to make long-term decisions on protection of our environment. It is critical, therefore that the composition of the Plan Steering Committee be broad-based and balanced to represent all segments of Pima County.

We look forward to working with you on this Plan.

Sincerely yours,



Lawrence J. Aldrich
President/Chairman of the Board
Southern Arizona Leadership Council

Enc.

Southern Arizona Leadership Council

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The Stanley Group

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AF Sterling Homes/Scotia Group, Ltd.

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Assenmacher, Bill
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Baker, Paul
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Cesare, Joe
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Rice, Karen
KGUN-TV 9

Stack, Bill
US West Communications

Thacker, John
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Trenary, Tom
Tucson Heart Hospital

Willert, Sister St. Joan
Carondelet Health Care Corp.

Williamson, David
Fairfield Homes, Inc.

Wright, David
Arizona Bank



Green Valley Community Coordinating Council, Inc.

Green Valley Mall • 101-148 S. La Canada Drive • Green Valley, AZ 85614-2633 • (520) 648-1936 • Fax (520) 648-5074

Carona Estates
Carona Estates II
Carona Hills Townhouses
Carona Ridge
Carona Serra Estates
Carona Vistas
Carona Vistas II
Casa Paloma I
Casa Paloma II
Castas Co-Owners
Clara Vista Del Valle
Continental Vistas
Country Club Estates
Country Club North
Country Club Vistas I
Country Club Vistas II
Country Club Vistas III
Desert Hills I Townhomes
Desert Hills II
Desert Hills III
Desert Hills III — West
Desert Hills IV
Desert Hills V
Desert Hills VI
Desert Hills Estates
Desert Meadows I
Desert Meadows II
Desert Meadows III
Desert Meadows TH
Desert Ridge
Encanto Estates
Esperanza Estates
Fairways
Foothills Townhouse IV
GV Resort Homes
GV Townhouses Assoc.
Highpointe
La Canada DH I
La Canada DH III
Madera Vista Townhouses
Porillo Hills I
Porillo Hills II
Pueblo Estates
Ranchettes
San Ignacio Golf Estates
San Ignacio Heights
San Ignacio Ridge Estates
Sunrise Pointe
Springpointe
Townhouse VI
Viewpoint
Villages
Villas East
Villas West
Concord Milestone Plus
Dorn K. Associates
Fairfield Green Valley
FRCO
GV Assoc. of Realtors
GV Chamber of Commerce
Green Valley Fire District
J.R.K. Inc.
Tucson Golf Association
TeamPartners of Southern AZ
Wilson Properties

November 25, 1998

C. H. Huckelberry, County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, AZ 85701-1317

Dear Mr. Huckelberry:

This responds to your October 28, 1998, request for our comments pertaining to the draft entitled Sonoran Desert Conservation Plan. The Green Valley Community Coordinating Council is pleased at this proposal to address issues of conservation in an orderly and careful manner.

While the topics in your draft Conservation Plan are of necessity only generally stated and require much specific investigation and discussion, we agree with the importance of dealing with the issues of combining the protection of precious desert resources with the desirability of controlled and responsible growth.

We do, however, regret the draft's seeming inclusion of Green Valley as an example of "urban sprawl." The facts are quite the opposite. Green Valley has been a planned community from its inception in the 1960's, as reflected by the Green Valley Community Plan which the Board of Supervisors specifically approved.

The GVCCC recognizes that continued development in Green Valley is inevitable and is very much concerned that these issues and the protection of cherished desert resources are examined in a thoughtful and balanced manner. We do recognize, as do you, that in the absence of plans for responsible and channeled growth irresponsible wildcat development becomes likely and poses a far less attractive alternative for all parties.

Essentially, the concept of classic desert conservation is desirable and should be considered as part of a total land use policy. Several of GVCCC's concerns are:

C. H. Huckelberry
November 25, 1998
Page 2

A. The Plan should be coordinated and a relevant part of the Pima County Comprehensive Land Use Plan which recognizes not only desert conservation but a need for sound residential, commercial and industrial development.

B. The draft plan appears to be more of a "wish list" than one based upon the relationship to land use policies and in some cases would encourage a leap frog development.

C. The plan, in the initial stage, should have some consideration to prioritizing projects, along with programming and budgeting of the plan elements.

D. The Plan should strongly relate to the extension of existing public lands.

E. The report is incomplete without a thorough discussion of the future use of the properties acquired. Will they be used for non-motorized recreation; if so, this will require a greatly expanded Parks and Recreation Department. If they are used for cattle ranching, as in the ranch component, what will be the administrative support for this type of management? If the Plan is to merely remove the cattle from the acquired property, there will have to be some method of managing the vegetation or we will have several Class A fire hazard properties.

F. Will the Cultural Resources be curated and interpreted for the public? Seems like they should be if the public buys the lands to preserve this component of the Plan. This is an expensive activity and will require ongoing administrative support. What is the plan for the future management of these properties?

G. The draft as a proposed mechanism inescapably raises the constitutional question of the historic rights of private property owners, for example, Fairfield Homes in relation to Canoa Ranch.

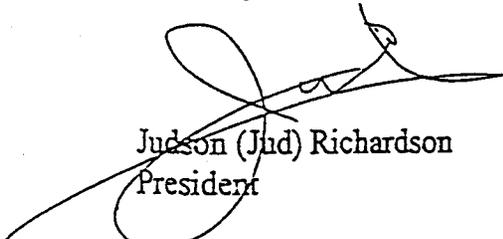
If the Plan is not fully adopted now, our immediate concern is Canoa Ranch. We have no desire for wildcating, wells, septic tanks and mobile homes on

C. H. Huckelberry
November 25, 1998
Page 3

the west side of I-19. This is in the Community of Green Valley as designated by the Board of Supervisors. Our mutual desire is toward organized growth and infrastructure.

In essence, this probably is a good plan but it is not complete. Future management and future management costs must also be disclosed and considered carefully. Page 33 of the draft proposes "some mechanism, both citizen and institutional, should be developed to guide regional consensus building for long-term implementation and success." In this respect, we surely hope the Green Valley Community Coordinating Council will be included as a continuous, active participant. The GVCCC Planning and Zoning Committee will continue to review this Plan. County officials will assist us in a further review at our December 9th Planning and Zoning Committee meeting.

Sincerely,



Judson (Jrd) Richardson
President
JR:jt



Saguaro Forest Associates

P.O. Box 18751, Tucson, Arizona 85731

November 27, 1998

Mr. C. H. Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, Arizona 85701

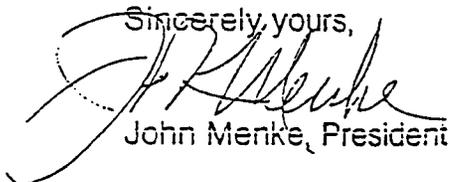
Dear Mr. Huckelberry:

We are delighted at Saguaro Forest Associates that, with great fanfare over the past couple weeks, you have presented the Sonoran Desert Protection Plan to the public. If part of all of the plan can be carried out over the next decade or two, many of the corridors that connect preserved habitats such as Saguaro National Park and the National Forests will be preserved. The corridors are very important to the preservation of viable populations of some species in these lands that were set aside earlier this century.

It has been brought to my attention that a Steering Committee of community members is currently being formed to oversee the SDPP/MSCP planning process. I would like one of our Board of Directors to be on that Steering Committee as we have focused on land use for the past 51 years (please see the attached Arizona Daily Star commentary on the work of our association in 1995-1996). My doctorate is in ecology and evolutionary biology and my understanding of the structure and function of natural communities might add to the quality of the work of the committee. Steward Davis, who is also on our Board of Directors could alternate with me in attending meetings and thereby diversify input into the work of the committee.

I look forward to hearing from you on the structuring of the Steering Committee.

Sincerely yours,



John Menke, President

comes to the question of Symington's veracity - his basic relationship to words and facts. Put simply, so much cynicism

Gov. Fife Symington has emptied some of those words of all meaning.

That does no one any good.

Responsibility

In an innovative exercise in responsibility, a number of eastside homeowners are agreeing to protect the character of their neighborhood and nearby Saguaro National Park by signing anti-development covenants.

The covenants, though voluntary, once signed are legally binding. They will prohibit building more than one house every 3.3 acres through the year 2040. That is the current zoning.

So far, 157 residents of the area between Broadway and Golf Links along the western edge of the park have signed the deed restrictions, which apply to them and to anybody they may sell their homes to in the future.

The effort among homeowners, who generally have moved to the area for its exceptional desert character, started several months ago with retired schoolteacher Ellen Barnes. She felt that the residents should be willing to agree to the same type of protective restrictions they ask of developers.

Barnes set out to win the agreement of 60 percent of the landowners in the 2-square-mile area. To do so, she set a deadline of Nov. 15. Now, just two weeks away, she needs only 14 more signatures to meet that self-imposed goal.

Residents who decline to sign are not affected by the covenants and are bound only by the area's zoning, which, of course, can be changed. Thus, covenant signers are voluntarily tying their own hands, and the hands of successor owners, as a way of ensuring the area retains its character.

This admirable effort speaks highly for Barnes and her fellow signatories. They are not asking government to do for them what they cannot do themselves. They are not trying to legally curtail rights of their neighbors. In the best of American traditions, they simply are putting their money where their mouth is.

It is an effort from which we all can gain inspiration. We hope the other 14 signers will come forth quickly.

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FUNDED AND DIRECTED BY SAGUARO FOREST ASSOCIATES.

5831 N. NO. 2, 1995

THIS AREA ONLY STAR FA IN ARIZONA ONLY STAR

A PEACE OF

An Israeli company builds a Hanes pl

AMMAN, Jordan - This new Middle East has got me confused.

On Saturday I had lunch in Jerusalem, got in a car, rode across the Allenby bridge to Jordan, and by 8 p.m. was dining in Amman at the opening of the Amman Economic Summit. At the dinner were Israelis, Palestinians, Qataris, Bahrainis, Kuwaitis and Jordanians. The most oft-used phrase around the table was "Can I have your business card?" After the meal, Uri Savir, Israel's top peace negotiator, spoke. He said the Middle East today was suffering from "psychological jet lag - people's minds simply have not caught up with what their bodies are now doing." I took back on my day and I think he is right.

So why am I confused? Because two weeks in Egypt, Israel and Jordan has left me wondering who will define this new Middle East: merchants,



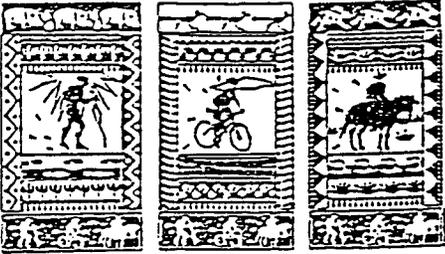
Thomas L. Friedman

mullahs or intellectuals? Let me share a few conversations.

Cairo: The Egyptian writer El-Sayed Yassin is worried. Like many Arab intellectuals he believes that Israel plans to dominate the region economically, as it once dominated it militarily. He tells me: "Israel believes that it should be the superpower in the area. It has this racist idea that the genius Jewish mind, cheap Arab labor and rich Arab capital can all be combined to its advantage. If it will not abandon this racist plan it will never succeed in the region."

Cairo: What the West calls "peace" between Israel and the Arab world is still, deep in the psyche of many Arabs, a fundamental defeat of everything their society stood for for the last 50 years. I am chatting with a young Egyptian friend who recently graduated from a Cairo university. When suddenly out of the blue he says to me: "Mr. Tom, sometimes you just want to say no to the Israelis, even if it doesn't make sense. That's why a lot of people are quietly cheering for Hafez al-Assad (the president of Syria). They are glad that someone is still ready to say no to the Israelis."

Jericho: I am waiting to see Saeb Erakat, a Palestinian minister. A Palestinian student from



PIMA TRAILS ASSOCIATION

Post Office Box 41358
Tucson, Arizona 85717
(520) 577-7919

November 29, 1998

Mr. Chuck Huckelberry
County Administrator
130 West Congress
Tucson, AZ 85701

Dear Chuck,

I am pleased to report that the board of Pima Trails Association unanimously lends its support to the concept of the *Sonoran Desert Conservation Plan*. The plan is far-reaching and innovative and will protect critical areas of Pima County - riparian habitat, ironwood forests and upland vegetation, as well as significant wildlife species. The plan also includes exciting opportunities for activities such as environmental education, hiking, backpacking, horseback riding, mountain biking, nature observation and photography.

This is the second time that the PTA board has voted in favor of this concept. Last spring we were proud to advocate the proposed *Pima County Mountain Park and Natural Preserve System*, and now we extend our support for the *Sonoran Desert Conservation Plan*. This new plan combines important aspects from the mountain park plan as well as the *Sonoran Desert Protection Plan*.

We in PTA congratulate you and your staff for your insight and vision. Pima Trails Association looks forward to assisting with this project as needed. Please contact Jan Johnson, in-coming president, at 825-6777, if you should need PTA's help. On behalf of PTA, it has been a pleasure working with you over the past 11 years and we anticipate additional partnership efforts. Best wishes to you, your staff and family for a wonderful holiday season and new year.

Happy trails always,

Jan Gingold
President

cc. Pima County Board of Supervisors
Dan Felix, Director, Pima County Parks and Recreation
PTA Board of Directors



November 29, 1998

Mr. C. H. Huckelberry
Pima County Administrator
130 West Congress, 10th Floor
Tucson, Arizona 85701
Fax: 740-8171

Dear Mr. Huckelberry:

Please reserve a seat for Defenders of Wildlife on the steering committee of the regional multiple species planning process. Either John Fritschie, Laura Hood, Craig Miller, or I will represent Defenders during this process, most likely myself

Thank you for your efforts to date in initiating this process.

Sincerely,

Andra S. Ewton
Grassroots Outreach Coordinator

837 North Queen Avenue
Tucson, Arizona 85705
Phone/fax: 882-0292

National Headquarters
1101 Fourteenth Street, NW
Suite 1408
Washington, DC 20005
Telephone 202-682-9400
Fax 202-682-1331
<http://www.defenders.org>

*Center for
Wildlife Connections*

1520 S. Desert Crest Dr. Tucson AZ 85713
Phone/Fax: (520) 623-3874

November 29, 1998

Dear Mr. Huckelberry,

The Center for Wildlife Connections would appreciate your consideration for a seat on the Sonoran Desert Conservation Plan Steering Committee.

In November 1997, the Center started promoting a regional plan to protect wildlife linkage corridors between natural preserves. This plan, the Pima County Wildlife Connections Project, was one of the major inspirations for the Sonoran Desert Protection Plan. Wildlife linkage corridors are now an important aspect in both the Sonoran Desert Protection Plan and the Sonoran Desert Conservation Plan. Our expertise in this area could be of great help to the Committee.

We are also interested in using creative land-use planning techniques to help protect natural areas with a minimum of taxpayer expense. With our knowledge of these techniques, we could be helpful in finding solutions to the difficult issues that will come before the Steering Committee.

The Center for Wildlife Connections is also in a unique position of being on the Open Space Acquisition Review Committee and is fully apprised of the acquisitions which the County is considering.

For these reasons as well as our willingness to work out differences with all stakeholders, we believe the Center for Wildlife Connections would be a helpful addition to the SDCP/MSCP Steering Committee.

We thank you for your consideration.

Sincerely,
Rob Kulakofsky
Executive Director





United States Department of the Interior

FISH AND WILDLIFE SERVICE

P.O. Box 1306
Albuquerque, New Mexico 87103
<http://ifw2es.fws.gov>

In Reply Refer To:
R2/ES-SE
CL11-0084

NOV 30 1998

Mr. C.H. Huckelberry
County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, Arizona 85701-1317

Dear Mr. Huckelberry:

Thank you for your letter of October 28, 1998, to Secretary Babbitt, and the draft of the Sonoran Desert Conservation Plan (SDCP). The Secretary has requested that I respond to you directly with the U.S. Fish and Wildlife Service's (Service) comments on Pima County's proposed ecosystem-based regional multi-species conservation plan.

First, the Service wishes to thank you and the citizenry of Pima County for having the vision to move forward with a comprehensive Sonoran Desert Conservation Plan. The Service is fully supportive of your efforts and the concept of the Sonoran Desert Conservation Plan's regional and broad design for ensuring habitat conservation for threatened and endangered species in Pima County. The Service intends to provide Pima County with a full level of technical support as development of the SDCP goes forward.

Following are general comments on the draft SDCP template for Pima County--

- ▶ The Service asks that the following tenets of conservation biology be kept in mind during development of SDCP--(1) conserve target species throughout the planning area; (2) large reserves are better; (3) keep reserve areas close to one another; (4) keep habitats contiguous; (5) link reserves with corridors; (6) make reserves diverse; and, (7) protect resources from encroachment.
- ▶ The Service believes that primarily three of the six current elements in the SDCP will directly assist in moving toward recovery of threatened and endangered species in Pima County. Those elements are--(3) riparian restoration; (5) habitat, biological and ecological corridor conservation; and

(6) critical and sensitive habitat conservation. In addition, the Service anticipates that conservation efforts within the other three elements of the SDCP (ranch, historic/cultural/cave, and mountain parks) will indirectly help preserve habitat quality and quantity for the needs of threatened and endangered species.

- ▶ The Service agrees that the pygmy-owl research elements needed in the short-term and mentioned in the draft SDCP are of utmost importance; we have made certain that the Department of the Interior has been made aware of these needs and their potential costs.
- ▶ The Service anticipates working closely with the County and other interested parties/stakeholders to address the needs of threatened and endangered species in Pima county within the framework of the SDCP.
- ▶ Presumably, the concept of an ecosystem-based regional conservation plan for Pima County under 10(a)(1)(B) of the Endangered Species Act will, in the final analysis, address both biological conservation goals, while creating certainty for the citizens and municipalities of Pima County. Thus if, as envisioned, efforts to restore riparian areas or generate new biological corridors/connections, promote recovery by bring threatened and endangered species into areas where they do not now exist, those participating in such a plan will be applauded and rewarded with assurances for providing conservation benefits to those threatened and endangered species and the habitats upon which they depend.
- ▶ The Service is excited to see that the SDCP's intent is to cover the entire county; as we are sure you are aware, details for most of the six elements currently address only Eastern Pima County, thus revealing an information gap that stakeholders will need to address in future SDCP development.
- ▶ We look forward to working with the County and participating in Steering Committee, Technical Advisory Team, and management planning activities for the SDCP.
- ▶ Specific editorial comments for your consideration are attached.

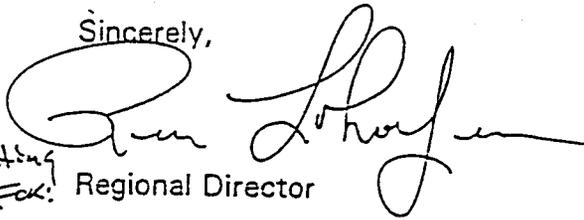
The Service appreciates all the effort that you, your staff, and the County Board of Supervisors have contributed to date in development of this draft SDCP framework. We applaud the county's commitment to a comprehensive plan for Pima County that addresses the needs of the threatened and endangered species dependent on the unique habitats in the County. We are encouraged by the broad and diverse cross-section of the community already participating in the public portion of this process.

Mr. C.H. Huckelberry

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Please contact me should you have additional comments or questions. Thank you for your continued interest in the cactus ferruginous pygmy-owl. The Service looks forward to working closely with you and the citizens of Pima County as the SDCP develops.

Sincerely,


Acting
Fox! Regional Director

Attachment

Attachment

1. Include your list of figures (now on blue paper at the end of the document) following the table of contents as well, for clarity.
2. On page 16, delete or change your reference to the Rincon Institute.
3. Make clear that on page 9 of the Preliminary Work Plan it is the Service's internal section 7 and the private sector's section 10 processes that are being referenced.
4. On Figure 2, include the date of establishment of the BOR wildlife corridor.
5. On Figure 3, include a category of "Other Federal Land" (besides BLM) or specifically key in your greens.
6. On Figure 4, move Wildlife Refuges, National Parks, etc up to the fourth item in the key list. Include a new category of Indian reservations, since these lands are considered "private".
7. In Figure 5, do you mean to show Carpenter Ranch (F) in Pinal County?
8. On Figures 7, 8, 11, 13, 14, 15, and 17, for clarity, insert the word "Land" after "Existing Pima County".
9. In future mapping, using colors like the orange and green in Figure 14, would help delineate the conservation benefits on individual HCPs in Pima County.
10. On Figures 19 & 20, it is difficult to distinguish what the orange color is (is it two colors overlying one another?).
11. On Figure 19, be specific about who owns the "Indian Nation" lands, and perhaps differentiate if these lands are owned by different Tribal entities.
12. On Figure 22, what does the green text mean? Already established mountain parks?
13. On Figure 23, it is difficult to distinguish between "Expansion Natural Preserves" and "Existing Natural Preserves". You may wish to make one a different color.
14. On Figure 25, the colors are very difficult to discern one from another (too many greens and yellows, with the differences too minor between to easily make out what category of critical and sensitive habitat is what). Can you do it by Class I and Class II categories as well?
15. In the Preliminary Work Plan, label the figure cover page (yellow sheet), and on the Figure itself include categories of "Private" and "Indian Lands" for clarity.



GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000
www.gf.state.az.us

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Duane L. Shroufe

Deputy Director
Thomas W. Spalding

November 30, 1998

Mr. C.H. Huckelberry
County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, Arizona 85701

Re: Sonoran Desert Conservation Plan - October 1998 Draft

Dear Mr. Huckelberry:

The Arizona Game and Fish Department (Department) has reviewed the draft Sonoran Desert Conservation Plan (SDCP). We wish to commend Pima County for visioning a future where economic stability and the impending pressures of urban growth are balanced with a concerted effort to conserve natural resources. The SDCP represents the type of landscape level planning which the Department believes best perpetuates biological diversity over the long-term.

As outlined in the document, the SDCP will be brought to fruition by the cumulative effect of past, present, and future projects. The Department has been an active participant in many of the past and present projects that are components of four SDCP elements addressed in the plan. Our participation has included direct funding contributions, resource-specific management recommendations, technical advisory services, and assistance in project conception and design. The following projects characterize the productive relationship that exists between the Department and Pima County:

Riparian Restoration

Marana High Plains Effluent Recharge
Cienega Creek Natural Preserve
"Pantano Jungle" Restoration

Mountain Parks

Tortolita Mountain Park
Tucson Mountain Park

Critical and Sensitive Habitats

Pima County Riparian Habitat Definition & Classification
Wildlife Habitat Inventory Project (WHIPS)

Mr. C.H. Huckelberry

November 30, 1998

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Although there has, to date, been limited opportunity for the Department and Pima County to partner on issues relating to Habitat, Biological, & Ecological (HB&E) Corridor Conservation and Ranch Conservation, we share an intense interest in the resources at issue because of their value to the State's wildlife resources. As an agency, we have a wealth of experience in managing wildlife resources, including sensitive species. And, as the agency responsible for managing the State's wildlife resources, we have substantial data and knowledge of animal behavior that should be factored into the final selection and preservation of HB&E corridors. In addition, the Department would like to reiterate our support for development of a regional Habitat Conservation Plan. The Department has direct experience working on multi-species conservation planning.

As a conceptual draft document, the SDCP is commendable. Implementation will be challenging and will require utilization of innovative partnerships. The Department encourages and seeks to participate in resource management strategies that are proactive and productive. We have a variety of potential financial resources that may be available, as appropriate. We also have scientific data and information to lend to Pima County's efforts.

As the SDCP is finalized and implementation strategies are developed, the Department would like to work cooperatively with the County to encourage consideration of issues important to the Department. These issues include:

- public access to proposed park areas and public access through County park areas to other publicly held lands where park areas abut federal or state holdings
- maintenance of hunting opportunities
- conservation of corridors commensurate with the needs of the targeted species and constraints created by surrounding land use context (HE&B corridors in the midst of urban environments merit different selection criteria than HE&B corridors established in a rural, wildland context)
- adjustment of park boundaries to be commensurate with resources targeted for conservation
- land management strategies that facilitate/perpetuate natural ecosystem processes

Per your request, the Department will provide specific comments on the SDCP to you by December 31, 1998. At that point, we will arrange a meeting to discuss the SDCP and the Department's comments in detail.

Mr. C.H. Huckelberry
November 30, 1998
3

Thank you for the opportunity to provide comments on the SDCP. We look forward to working cooperatively with Pima County on this planning effort. If you have any questions, please contact me at (602) 789-3604.

Sincerely,



David L. Walker
Habitat Branch Chief

DLW:sr

cc: Terry Johnson, Nongame Branch Chief
Tice Supplee, Game Branch Chief
Gerry Perry, Regional Supervisor, Region V

AGFD# 11-4-98(02)

November 30, 1998

Dear Mr. Huckelberry,

As a resident of Pima County since 1951, I have watched the changes growth has brought to our valley and applaud the Board's adoption of the SDCP. I encourage the county to pursue a cooperative agreement with federal and state agencies to further this goal.

As a stakeholder with many interests in this process, I would like to volunteer to be on the steering committee that will help facilitate our mutual goals of conservation of our many resources and safe, sensitive and sustainable growth.

Thank you for your consideration.

Sincerely,

Christina McVie
4420 W. Cortaro Farms
Tucson, Az. 85742

Nov. 30, 1998

Dear Mr. Huckelberry,

I have been a resident of Pima County since 1971. I have been a property owner on the northwest side since 1983. I currently own approximately 28 acres south of Arthur Park Park. As someone directly affected by endangered species/growth issues I would like to serve on the steering committee for the S.D.C.P./M.S.C.P. Thank you for your consideration in this regard.

Sincerely

Douglas S. McVie

Douglas S. McVie

4420W. Cortaro Farms Rd

Tucson AZ 85742

TO: MR CHUCK HUCKELBERRY

FX: 740-8171

RE: MSCD / (SDPP?) STEERING COMMITTEE

DATE: 11.30.98

DEAR MR HUCKELBERRY,

I HAVE JUST SPOKEN WITH ANDREA EUNTON (AROUND 6 PM 11.30)
& SHE STRONGLY SUGGESTED I FAX YOU & ASK TO BE A
MEMBER OF THE STEERING COMMITTEE. AS THE COORDINATOR
OF THE NORTHERN TUCSON MOUNTAINS RESOURCE CONSERVATION/
EDUCATION PROJECT, WHICH IS ABOUT HALF WAY THROUGH ITS
SERIES OF WORKSHOPS FOR RESIDENTS, PLANNERS, DEVELOPERS,
PARK OFFICIALS & EDUCATORS, I WOULD BE GLAD TO SHARE OUR
WORK: ~~THE~~ ORGANIZING STRATEGIES FOR SUPPORTING BENEFICIAL
DEVELOPMENT IN OUR WATERSHED - WITH THE GREATER, COUNTY-WIDE
PLANNING PROCESS -

I WOULD ALSO LIKE TO "NOMINATE" TWO OTHERS WHOSE
INPUT WOULD BE INVALUABLE - MARK HOLDEN OF SAGUARO
NATIONAL PARK WEST (733.5173) & DANIEL PRESTON OF
THE SAN XAVIER PLANNING DEPARTMENT (2018 W. SAN XAVIER
ROAD, 85746)

THANK YOU FOR YOUR CONSIDERATION. I WILL BE SEND-
ING YOU A FULL UPDATE ON OUR SERIES OF WORK-
SHOPS. FOR THE FALL, WHICH WE COMPLETED NOVEMBER 22;
I'M SORRY NO ONE FROM YOUR OFFICE COULD ATTEND.

SINCERELY,

 744.9305 (PLEASE CALL ANYTIME)

8945 N. SCENE DRIVE, TUCSON, AZ 85743

P.S. GOOD ARTICLE ABOUT YOU IN THE WEEKLY !!

Dec. 01 1998 12:20 PM P1

FAX NO. : 5287445385

FROM : B. ROSE

1901 S. Tilting T Pl.
Tucson, AZ 85713

November 30, 1998

Mr. Chuck Huckleberry
Pima County Administrator
130 W. Congress St.
Tucson, AZ 85701

Attention: Maeveen Behan

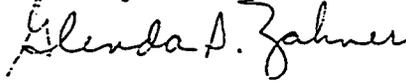
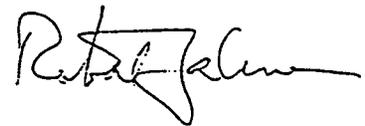
Dear Mr. Huckleberry:

We enthusiastically endorse your proposal for a Sonoran Desert Conservation Plan. Twenty-five years ago we decided to move to Tucson because we fell in love with the beauty and uniqueness of the desert environment, the historical context of the city and the amazingly harmonious multiculturalism of the people who live here.

Sadly, all of these have been eroding over the past few decades. Every acre of desert that is bladed away and "developed" makes Tucson a less desirable place to live. The Sonoran Desert Conservation plan could save the heart and soul of Tucson, by protecting it's context within the Sonoran desert environment.

We applaud your courage and vision in presenting this extraordinary plan. We urge the Supervisors to approve it.

Sincerely,

Glenda and Robert Zahner

Copies to Pima County Supervisors

Nov. 30, 1998

Dear Mr. Huckleberry; -

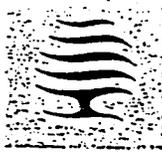
I am in full support of the
Sonoran Desert Conservation Plan.

It has been a long time in coming
Thank for the "backbone" in presenting
this plan. - Let's move ahead!

Sincerely
John A. Pimental
Catherine B. Pimental



John A. Pimental
5543 W Rocking Cir. St.
Tucson, AZ 85713-8316



December 1, 1998

Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress St 10th Floor
Tucson, Arizona 85711

Re: Sonoran Desert Conservation Plan

Dear Mr. Huckelberry,

Thank you for the opportunity to comment on the draft of the Sonoran Desert Conservation Plan. As you know, we are the developers of the Dove Mountain community. In the plan, Pima County shows a portion of our property as future expansion area for the Tortolita Mountain Park. In addition, you indicate possible expansion of the Tortolita Mountain Park of approximately 30,000 acres of public lands and additional private lands.

At Dove Mountain we are already actively developing in the area shown on your maps as future park expansion. Portions of the new Gallery Golf Club at Dove Mountain, and portions of our estate lot subdivision Canyon Pass are within areas you show as expansion areas. Other areas shown on your maps for future park expansion are zoned for major hotel and golf course development and additional estate lot development. This would be extremely expensive land for Pima County to purchase for park expansion. We are not interested in having any of this Dove Mountain property become part of the park.

We are very supportive of the expansion of the Tortolita Mountain Park by Pima County. We understand that several of the other private land owners in the area are interested in selling land to Pima County. We certainly support Pima County acquiring these lands or any of the public lands that are targeted.

We request that in any final document to be approved by Pima County that the Dove Mountain lands be removed from the areas shown for expansion of the Tortolita Mountain Park.

Dove Mountain does have a written agreement with Pima County Parks on trails within Dove Mountain and for the future development of parking and access to the Tortolita Mountain Park. We have worked closely with Pima County in developing this agreement that greatly benefits the Tortolita Mountain Park and look forward to continuing this positive working relationship as the park is expanded.

Sincerely yours,

David Mehi
President

3567 East Sunrise Drive, Suite 219, Tucson, Arizona 85718 (520) 299-8424 FAX (520) 577-2391

COTTONWOOD PROPERTIES

2273 W. Ocelot Dr.
Tucson, AZ 85713-1237
December 1, 1998

Mr. Chuck Huckleberry, County Administrator
130 W. Congress
Tucson, AZ 85701

U

Dear Mr. Huckleberry:

I am writing in regard to your ambitious Sonoran Desert Conservation Plan, which you estimate will cost taxpayers \$300-500 million.

Why is this necessary?

Does the government need to own everything? No!

Do you think money grows on the ironwoods that you want to protect? I have not seen any.

Our property taxes have increased at a much higher rate than the Consumer Price Index. How can you, in good conscience, commit us to be taxed even more to pay for your project? The money has to come from taxpayers, whether through county, state, or federal taxes; whether from property taxes, income taxes, or sales taxes.

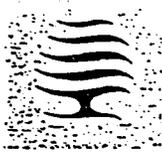
If there are about a million people in Pima County, you are committing us to pay \$300 to \$500 each, for land that most of us will never see. If there are about half a million taxpayers in Pima County, you are committing us to pay \$600 to \$1000 each. This is unforgivably ridiculous.

If the Sonoran Desert Protection Plan is so important, will you pay my share?

Sincerely,

Robert C. Smith

Robert C. Smith



December 3, 1998

Ms. Maeveen Behan
Pima County Administration
130 W. Congress, 10th Floor
Tucson, Arizona 85701

Re: Sonoran Desert Conservation Plan

Dear Maeveen:

I have worked in real estate development for over 10 years and in that time had the opportunity to learn a great deal about endangered species issues, environmental planning and the economics of real estate development. Please let this letter serve as my request to be a member of the steering committee for the Sonoran Desert Conservation Plan.

If you need any additional information in this regard, please do not hesitate to contact me.

Sincerely,

William Hallinan
Vice President

c: David Mehl

Timothy R. Blowers
13950 N. Seifert Estates Drive
Tortolita, Arizona 85742
Office/Fax 297-9654 Cell 349-7677
Email landman@azstarnet.com

December 3, 1998

The Honorable Chuck Huckelberry,
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701-1317

Dear Mr. Huckelberry,

I want to thank you and your excellent staff for all the work that has gone into the regional comprehensive resource protection plan (S.D.C.P.) adopted by the Board of Supervisors.

I had visited Tucson prior to moving here in 1973 from the farm in Minnesota with my wife Lois. In 1975, we bought a four bedroom house near Reid Park. In 1977, we purchased (and still own) our first 10 acres of land on the beautiful (but then remote) west side of the Tortolita Mountains near Carpenter Ranch. Since our daughters birth in 1981, we have resided in a home I built on 5 acres in the southern foothills of the Tortolita Mountains.

Since 1977, I have invested in thousands of acres in Pima and Pinal County. In addition to establishing strict guidelines for the development of my properties, I have assisted many other land owners by providing information and recommendations for planning and developing in a environmentally sensitive and sustainable manner.

In the past few months I have effectively "downzoned" over 1300 acres in southern Pinal County, through the use of C.C. & R's. In one case over 500 acres went from (GR) one home per one and one quarter acres, to one home per 10 acres. In addition to the minimum acreage sizes, I like to restrict the maximum amount of clearing to less than 15%. This results in real protection for threatened and endangered species and conserves 85% of the property while allowing human habitation at sustainable levels. This approach places me in a unique relationship with both the environmental and development communities, while affording me a lucrative income.

I am delighted the county has chosen to preserve it's heritage and am happy to have assisted in saving the Carpenter Ranch. I support the county seeking a formal working relationship with the citizens steering Committee as well as the appropriate state and federal agencies. I would like to share my good fortune and enthusiasm by volunteering to serve on the M.S.C.P. steering committee.

Sincerely,


Tim Blowers

December 4, 1998

Dear Mr. Huckleberry,

I have been a resident of Pima County since 1992. I am currently a property owner in the Northwest Tucson area. I am encouraged by the recent SDCP which your office and the board are pursuing. I would like to volunteer to be on the steering committee for the plan and assist in any way that I can. I am presently serving on the county Open Space Committee which has given me some insight into our future needs for a growing Pima County.

Sincerely,

A handwritten signature in cursive script that reads "Neale Allen".

Neale Allen

Mountainview Homeowners Association,

President

Northwest Coalition for Responsible Development,

Member

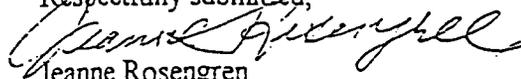
December 6, 1998

The Pima County Administrator
120 W. Congress St.
Tucson, AZ 85701
Attn: Maeveen Behan

Dear Mr. Huckleberry:

The Sonoran Desert is under seige and it is encouraging to hear that something is at least being suggested. I would like to express my opinion and hope that at least it will be heard. Our desert here is a one of a kind. It is the ONLY area in the world where the Saguaro grows naturally. Air pollution is the one thing that will permanently remove the Saguaro. Air pollution comes with over population. There are some things in life that are more important than money in the pockets of developers who have no vested interest in this area except to make money and then get out and move on. Tucson residents then have to live with the results of their rape of the desert. I feel that it would be in the best interest of Pima County that a moratorium on development be declared for a year during which time a comprehensive development plan for the area can be worked out without pressure from developers. I am not against development but am against the wholesale lack of direction that has been the current trend. If people want another Phoenix that is one thing but you cannot have the Sonoran Desert and that type of development. I don't understand why we need a New York City here. Limited development could be a plus. People would see this area as a prototype of what can be done by a community to save its natural resources. We need progressive people who are willing to say NO to the developers. It is really not so hard to do. I work hard in the Tucson Mountain Park picking up trash so I know very well what happens when our resources are not protected. There is no comprehensive plan for that park. They even allow hunting in an area that is so heavily used by hikers that they are in danger during that season. We should never allow hunting permits of any kind in an area so close to a heavily populated area. Just because they have been allowed to hunt for years does not mean it should continue. Arrows and kills have been found in areas where there is no hunting allowed. Hunters make their own rules and we are fools to think they will follow guidelines. There are many problems but the only way to handle them is to take a firm stand and not cave in to special interests whose only interest is making money. Even the Game and Fish Department has indicated that the sale of hunting permits is more important to them than the wildlife. This is a sad commentary on the state of affairs in this area. My personal opinion is that people always have someone to speak out for them but our plants and wildlife have no voices and depend upon us for their lives. Please give them your voice and protect the Sonoran Desert.

Respectfully submitted,



Jeanne Rosengren
2360 S. Lazy A Place
Tucson, AZ 85713

JAMES A. SHINER
790 WEST PANORAMA ROAD
TUCSON, AZ 85704
520-297-8820
FAX: 520-297-9217

December 5, 1998

C.H. HUCKELBERRY
County Administrator's Office
Pima County Governmental Center
130 W. Congress
Tucson, AZ 85701-8171

RE: STEERING COMMITTEE - SDCP/HCMP

Dear Mr. Huckelberry:

I have been informed that you are in the process of forming a committee to assist in the development of the SONORAN DESERT PROTECTION PLAN and the MULTI SPECIES HABITAT CONSERVATION PLAN for Pima County. I would like to be considered for appointment to the committee.

The following is an abbreviated resume:

Resident of Pima County since 1971.
Married(1971) with two children (Mika 17 & Michael 12).
1971 - B.B.A.(major Real Estate & Urban Land Economics) University of Wisconsin.
1974 - J.D. "with distinction" from the U of A.
1974-1983 practiced law in Tucson.
1976 to the present I have been involved the real estate market in Southern Arizona as an investor and developer.

I have participated in the development process as an investor, lawyer and developer. Specifically, I have been involved in the formation of area plans, zoning, platting, permitting, certification of a water utility and intergovernmental agreements. Recently, LKB, L.L.C., of which I am a member secured a habitat conservation permit for the Lazy K Bar Guest Ranch. You provided comments to US Fish & Wildlife on that application.

While I have been continuously involved in a variety of community activities on a volunteer basis, three may be relevant to my qualifications to serve on the committee. I was a member of the Arizona State Land Department Board of Appeals for six years. Second, I created and was an instructor (with Professor Winton Woods) of a real estate and community development seminar at the U of A College of Law in the mid 80's. You were kind enough to participate as a guest lecturer on the transportation issue. Finally, since 1996 I have been a Sector Board Member working on the development of Oro Valley's comprehensive plan.

C.H. HUCKELBERRY

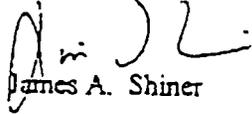
Page 2

December 5, 1998

The work you are doing with the SDCP and HCMP is far sighted and important to the evolution of the community. Many of the "stakeholders" involved in this planning are energetic, intelligent and interesting. I would enjoy the opportunity to work with them, you and the Board on these plans.

Please feel free to contact me if you need additional information. In advance, thank you for your consideration.

Sincerely yours,



James A. Shiner

C:\WPDOCS\PCCOM1.WPD

12/3/98

Maeveen Behan
Pima County Managers Office
Via Fax:740-8171

Maeveen:

Thank you for your diligence and focus on the MSHCP as well as your continuing ability to bring a refreshing and positive attitude to what I know has been a grueling work load.

I would like to submit my name for consideration regarding potential appointment to the Steering Committee and possibly some of the subcommittees as well. In an effort to give you some idea of my background and involvement with land use issues and my professional experience I am more than happy to submit my resume if you feel it appropriate.

Some items which may not be adequately addressed in my resume, but which are related and important are:

- I was an instrumental part of the Empirita Ranch acquisition and preservation.
- I was an instrumental part of the BLM land exchange which took out of private ownership a substantial amount of what will become the Empire Mountain Park.
- I was an instrumental part of the Bellota Ranch acquisition (our work made the TNC/City purchase possible).
- I was an instrumental part in the protection of a substantial portion of the Aravaipa Creek Riparian Corridor and the perpetual in-stream flow of a pre-1919 surface water right.
- I played a role in the establishment of the Kingston Ranch Equestrian Trail Head (BLM/Pima County).
- I played a role in the establishment of migration corridors for Big Horn Sheep in the Silverbell area.
- I have a strong background in land exchanges (multi-legged), conservation easements, mineral and water rights and other creative tools such as life estates, lease backs and land trusts.
- I have a strong background in condemnation law.
- I have a working knowledge of mitigation banking.
- I have 20 years of professional work in and on vacant land in Pima County and am intimately knowledgeable about the southeastern portion of our County.

I believe that I am singularly responsible for opening the door of communication between the environmental and property rights advocates. It was my aggressive solicitation of Carolyn Campbell/Rob Kulikowski after the land use debate this past summer which set the tone for the positive climate in which we now find ourselves. I would encourage you to verify this with them as well as Zimet and Brenner.

I am not interested in serving in a rubber stamp or do nothing position. If there is a meaningful role which I can play I will jump in with both feet and attempt to match your energy and enthusiasm.

Please let me know your thoughts when you get a moment and can catch your breath.

Thank you.

Sincerely,

William Arnold

**EXECUTIVE SUMMARY:
CITY STAFF REVIEW OF THE
SONORAN DESERT CONSERVATION PLAN**

City staff applauds the County's efforts to develop a comprehensive habitat conservation plan and believes many elements of the Sonoran Desert Conservation Plan (referred to hereafter as the Plan) address the needs of Pima County's residents regardless of where they live. In this first assessment, City staff will comment on elements of the Plan that we believe require strengthening or elements that need to be added to insure that needs and concerns which most immediately affect our citizens within the corporate city limits of Tucson are appropriately addressed. Staff will elaborate verbally at the Public Works and Environmental Subcommittee Meeting, and will prepare a full written report for the Mayor and Council

Growing Smarter Legislation

- The Growing Smarter legislation, which requires that all jurisdictions adopt a comprehensive or general plans update by December 31, 2001, is not addressed.
- While the Plan calculates the gross impact of population growth, it needs to give greater weight to the mitigation of adverse effects through the application of environmental regulations such as the Environmental Resource Zone, the Hillside Development Zone, the Wash Ordinance, and the Native Plan Protection Ordinance.
- The newly designated preserves, parks and open spaces are remote from the City and further segregate the human population from the desert around them.
- The Plan should include dedications of open space by the private sector to a greater extent.

Planning Process

- The Plan should follow a comprehensive planning process.
- The development of a public participation process is a requirement for good planning and a specific requirement of the Growing Smarter legislation.

Land Use

- The Plan should identify past Open Space areas such as the Desert Belt and Tucson-to-Tortolita Mountains connection.
- The continuity of Open Space such as Riverparks can and should be more uniformly treated in the Plan.
- Federal programs such as Saguaro National Park expansion should be addressed in the Plan.

Livable Tucson

- The Livable Tucson Vision Process and the 17 goals that call for more natural open space within the City that is accessible by bike or foot can and should be addressed in the Plan.

Water Element

- Pima County's Sonoran Desert Conservation Plan refers to projects that will use reclaimed water or Central Arizona Project water, owned by the City of Tucson.
- These proposed projects would require careful study and consultation with Tucson Water prior to implementation.

Comprehensive Plan-- Parks, Recreation, Open Space and Trails Element

The Plan should be consistent with the policies in the Parks, Recreation, Open Space and Trails element of the Tucson Comprehensive Plan listed below:

- Provide interconnected trail system throughout the City and connect open space in urbanized area to surrounding public natural areas;
- Implement an interconnected regional open space system through cooperative public and private efforts;
- Prioritize acquisition and preservation of open space on findings of Pima County Open Space Report;
- Identify and establish sources permanent funding for acquisition and management of open space; and
- Recognize value of cultural, historical and archeological sites as important open space resources.

DESCRIPTIONS OF:

Growing Smarter Legislation

The Growing Smarter legislation requires the addition of four new elements on open space, growth areas, environmental planning and cost of development. The legislation further requires that the elements have regional applicability and specifies that the open space element include a comprehensive inventory of open space areas, provide policies for managing, protecting and acquiring open space areas and strategies for promoting a regional system of integrated open space and recreational resources. The environmental element must contain strategies to address anticipated effects on natural resources created by urban development.

Eastern Pima County Vision

The City of Tucson adopted the Regional Vision for Eastern Pima County in 1990 which foresees an interconnected network of open space including park lands, washes, riparian

habitats and public preserves throughout the region. Critical natural areas and designated peaks and ridges are to be protected in a variety of ways, including acquisition by public agencies. The Regional Vision for Eastern Pima County recommendations to provide economic incentives to preserve and restore historic and cultural resources are also consistent with those of the proposed plan. The *Vision* document seeks greater integration of land uses in the urbanized area, including infill development featuring higher density residential development and concentrated commercial activity centers, as well as redevelopment corridors to replace peripheral sprawl.

Return-Path: <bob@darkskys.com>
X-Sender: bob@darkskys.com
Date: Tue, 08 Dec 1998 09:19:07 -0700
To: pi@pagnet.org
From: bob@darkskys.com
Subject: Land Use
X-Loop-Detect: 1

Dear Chuck Huckelberry,

FAX: 740-8171

Hey Chuck,

Your plan just doesn't go far enough. Have you been out to the base of Empire Mts (Empire Peak area)? That whole region including the creek should be protected. The creek flows to Bobo Spring from the Doppler Radar. This area is currently under development by the (ignorant and unwilling to cooperate) locals.

The peaks need to be protected in the area and so do the riparian areas which are not reflected on your plan. The areas are Sect(s) 21, 28, 33, 34, 27, 22, 35, 36, 09, 03, 05.

This area was designated "scenic". If you don't protect it now, who will?

Bob Deming
Mary Kidwell
Kidwell Trust

Dec. 9, 1996

To whom It may Concern:

My name is Lara Putney.

I live in a small community called Sierrita Mining and Ranching.

I have lived here all of my life with other family members. My great-grandfather helped to settle this land. My grandfather lived here all of his life, raising his family. My father raised his family here. I have lived here all of my life, watching my children grow up. Now I am watching my grandchildren grow up here.

We feel that all of our children have been taught good family values.

We do not understand what is happening or why it is happening. Why are we going to be forced off of this land if we refuse to sell?

We have watched over this land for well over one hundred years. We have taken great care of the animals and plants while we have been here. We have kept the land clean and free

from litter. If allowed to keep this land we would continue to do so.

We are very afraid if this land is opened up as a park danger will move in. Our children will not know safety any more. The land will no longer be kept clean.

Our forefathers have been buried here in a small cemetery. WE LOVE THIS LAND! we do not want to leave! Our roots are here.

This is our homes and our livelihoods, why is this happening? what have we done? where is our freedom? Won't someone tell us what is going on? why are we being thrown aside as if no one cared?

Please have compassion and understanding for us. Try to put yourselves in our position. How would you like to have your homes and your jobs taken away

from you? Won't someone listen?

We are not against parks. We think that they are good, but not when people are put off of the land that they have nurtured and cared for for over one hundred years. Where is the justice in that?

Won't you listen to our cry for help? What have we done wrong? Why won't anyone listen?

We feel safe and secure here. A safe place to raise our children, with family members all around us.

I don't know what else I can say in our defense. Thank you for taking the time to read this letter.

May God Bless you,

Lora M. Autrey

Please listen to our cry for HELP!

①

Whomever it may concern,

My name is Janette Awtry. I live on McGehee Ranch in the Sierrita Mountains. I have lived here my whole life. It is the only home I have known. I work here also for the Sierrita Mining and Ranching Co. Not everyone who lives here works for the Company. We all have one thing in common. The fear of the unknown. The fear of losing our home.

Rumor is a park is being planned to be put in the Sierrita Mountain Range. Now, I'm sure we are not against parks. They are a good thing. Our fear however, is basically fear of what we do not know about your plan. What is it that you want?



①

(2)

My family has settled here for over one hundred years. Even before Arizona was a State. The wildlife in this area have flourished along with the people. The reason for this is that we have been good stewards of the land. Do not fix what is not broken.

We have a wonderful little community. One of the few places left where it is safe to raise children, and have the opportunity to teach them good family values. We know our neighbors and help each other. Not everything is perfect here. I doubt anywhere on Earth is. But we love our home. If a park is made then that would bring a lot more traffic. →



(3)

③

That may cause pollution and possibly bring in bad elements, that might cause things not to be as safe as they once were. Our children are free to play without any unusual worries. Why would anyone want that to change? What is your plan? Do you plan to take away our home? Make us move? Where would we go and what would our lives really be without each other? We have always believed how important it is to stick to our roots. We know who we are and where we're from. We have always felt very blessed. Please →



③

4

take the time to understand our fears. Please reconsider Changing our lives. If this is not what you have intended please let us know what you do intend.

Thankyou for reading
this letter,
God Bless
Miss. Janette K. Autrey

P.S. Please remember not only our homes but our jobs our livelihoods are also on the line.



4

10:11:20-007
CDM 12/15/98



Box 5906. Tucson. Arizona 85703-0906

December 9, 1998

Mr. C.H. Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

RE: SDCP/MSCP Steering Committee

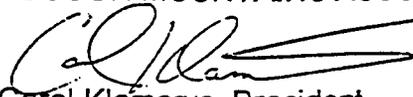
Dear Mr. Huckleberry:

The Tucson Mountains Association, a member organization of the SDPP Coalition, would like to nominate Bruce Gungle as their representative to the SDCP steering committee. Please contact him at 1651 N. Painted Hills, Tucson, Arizona, 85745, phone 743-0809, email gungle@atmo.arizona.edu, with information about when the committee will convene.

We appreciate being given the opportunity to be closely involved with this most important project.

Sincerely,

TUCSON MOUNTAINS ASSOCIATION



Carol Klamerus, President

xc: Pima County Supervisors



P.O. Box 16233
Tucson, AZ 85732-6233
520-327-4210

December 10, 1998

Maeveen Behan, Pima County Assistant Administrator
Pima County Administrator's Office
130 West Congress, 11th Floor
Tucson, Arizona 85701-1332
520/740-8135(tel.)

SENT VIA U.S. MAIL

Re: **Pima County Multi-Species Habitat Conservation Plan Steering
Committee**

Dear Maeveen:

This letter is a formal expression of interest by the Metropolitan Pima Alliance for a representative of our organization to serve on the Steering Committee for the Pima County Multi-Species Habitat Conservation Plan. I have included a copy of our organization brochure for your use and review. Metropolitan Pima Alliance represents all facets of the real estate industry in eastern Pima County. The Metropolitan Pima Alliance pledges to provide a knowledgeable and active representative, to participate in an open and straightforward manner to provide input to the committee as needed, and to assist in creating a plan that is workable for the community and improves the quality of life in eastern Pima County.

We look forward to hearing from you as soon as possible.

Sincerely,

METROPOLITAN PIMA ALLIANCE

A handwritten signature in black ink that reads "Timothy L. Terrill". The signature is written in a cursive style with a large, looped "T" and "L".

Timothy L. Terrill, P.E.
President

Re: Sonoran Conservation Plan

To whom it may concern:

I'm just writing to let you know that my family and I object to the Sonoran Conservation Plan.

I am a wife and a mother of three. I have lived here all my life. I have known no other home. I have always felt safe and welcome here. I'm afraid that this conservation plan will change all of this. My family and I like to spend time riding in these mountains. We enjoy the beauty and the chance to spend time together as a family and we have never objected for other people, not from here, to do the same. These mountains are very precious to us. This plan will change this for us and other families that live here.

Thank you for your time,
Alexandra Martinez

December 12, 1998

Chuck Huckleberry
Pima County Administrator
Pima County Public Works Center
201 North Stone Avenue, 7th Floor
Tucson, Arizona 85701-1207

Re: Public comments through Jan. 15, 1999
on Sonoran Desert Conservation Plan,
Dec. 3, 1998 Board of Supervisors
Memorandum, and Steering Committee

Dear Mr. Huckleberry,

We were very pleased that we were invited to attend a Altar Valley Valley Watershed meeting at the Chilton ranch near Arivaca on Dec. 6, 1998 and hear both Linda Mayo and Maeveen Behavan inform us and give us handouts on what is happening regarding the Sonoran Desert Conservation Plan. Thank you and your staff for this gesture.

In the Board of Supervisors Memorandum of Dec. 3, 1998 you made the statement "To comply with the Endangered Species Act, the Board has directed that the County proceed with the development of the Multi-Species Habitat Conservation Plan. This Plan, completed under the auspices of the United States Fish and Wildlife Service, Department of Interior will ensure that the economic well-being of the community is safe guarded while endangered species are protected."

As private property owners listed on the Pima County Ranch and Agricultural Land use with State and Federal Lands Map, our property has been specifically targeted as a future ranch conservation area. Also on Pima County Riparian Habitat in Eastern Pima County Map our property has been listed as Hydromeso Riparian Habitat.

We strongly feel as President and Vice-President of our small business Corporation that we both be seated on the Steering Committee, with only one voice representing our interests. After all this does affect either and both of us and our future. Thank you for your consideration.

Sincerely,

Donald E. Honnas, President
Carolyn P. Honnas, Vice-President
Honnas Land and Cattle Co.
Arivaca Arizona 85601
Telephone 520-398-2391

12-12-98

DEC 14 1998

To whoever this may concern,

There is a plan to make a park in the Sierrita Mountain range. I live on the Sierrita Mountain range. I also work for the Sierrita Mining and Ranching Company. I am a clerk, I work in our Small Store.

We do not think a park is needed here. It would bring too much traffic causing pollution. It would bring many strangers. Some of them could be bad and interfere with our peaceful way of life.

We believe people should still have the right to live as they wish. As long as it hurts no one else. So did many great men of this country.

We have not sprawled out all over these mountains. We never plan to. We have and will not sell to no one, not even some of our own kin. We have not done so for over one hundred years and never plan to.

We have not hurt anyone by living here. We take good care of these hills. We help the wildlife by giving our cattle water.

We are happy here. We do not think our lives need to be changed. So what we have to say to those who are doing this is, please do not come and fix what is not broken.

Patricia E. Awtrcy
HC 70 Box 4480
Sahuarita, AZ 85629

Sincerely
Patricia E. Awtrcy

FRANCES W. WERNER
3216 N. Jackson Avenue
Tucson, Arizona 85719

Chuck Huckelberry, County Administrator
130 W. Congress, 10th floor
Tucson, Az. 85701-1317

Dear Chuck;

I am very impressed with the Sonoran Desert Conservation Plan proposal that you presented to the Board of Supervisors recently. As you know I have been interested in, and involved with, conservation/planning for many years. It is my understanding that you will be establishing an "advisory" committee to work with county staff and others on the myriad of details that will have to be developed for implementation of this concept. I would feel privileged to be considered for appointment to a committee. I have both a B.S. and a M.S. degree in zoology and understand the need to protect habitat for desert wildlife. I still remember the testimony at P and Z in the early '70s when there was the proposal for a subdivision where Cataline State Park is now. "The wildlife can just move somewhere else". The "somewhere else" is disappearing at an alarming rate and the time is right to think about what areas are most in need of some sort of protection.

Again, I congratulate you on your far-reaching proposal and offer whatever help I might be able to provide in its implementation.

Cordially,

Frances

Frances W. Werner
12/14/98
Phone: 325-7228
Fax: same

LOU BENSON CONSTRUCTION COMPANY
2590 W. TORTOLITA HILLS TR.
TUCSON, AZ 85742
520-797-1237

12/14/98

Dear Mr. Huckelberry:

I am writing this letter to ask that we be considered for appointment to the committee that is forming to assist your office in regards to the Sonoran Desert Protection Plan and the Multi Species Habitat Conservation Plan.

As a licensed contractor in Pima County since February 1977, we have built custom homes almost exclusively on CR-1 and SR properties. Typically our clients are very sensitive to the environment and we pride ourselves in being an environmentally conscious builder. We have proven year after year that it is possible to live with the land without destroying the natural habitat. For this reason we feel we would be very helpful to your office if we were selected to be on the steering committee.

Principals of Lou Benson Construction

Robyn Benson, Sec/Tres.

Resident of Pima Co. since 1974

Associates Degree in Business

Co-Owner of Lou Benson Construction since 1977

Served on the sector board of the CDO Comprehensive Plan

Served on the Committee to incorporate The Town of Tortolita

Currently Secretary for Friends of Tortolita

Actively involved in our local homeowners association

Louis Benson, Pres.

Resident of Pima Co. since 1974

Co-Owner of Lou Benson Construction since 1977

Served on the Oro Valley 20-20 Plan

Served on the Committee to incorporate The Town of Tortolita

Actively involved in our local homeowners association and in protecting the Sonoran Desert

If it would be possible, please consider our company as a member of the committee and allow both Louis and I to share the position.

At this time I would like to thank you and your office for the excellent work you have done to date.

Sincerely,

Robyn Benson

LAURENCE MARC BERLIN, Esq.

4205 E. Skyline Drive
Tucson, Arizona 85718

Phone: (520) 615-0034
Fax: (520) 615-0102
e-mail: lberlin@azstarnet.com

December 14, 1998

Chuck Huckelberry
Pima County Administrator
130 West Congress, 10th Floor
Tucson, Arizona 85701-1317

Re: Participation In Sonoran Desert Conservation Planning Process

Dear Mr. Huckelberry:

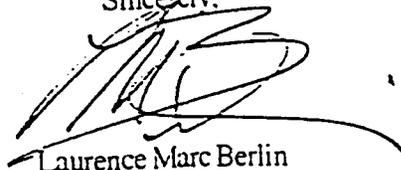
It was a pleasure to meet you at the reception for Secretary Babbitt on December 3. *This note is to express my interest in working on the Steering Committee and/or the Technical Advisory Teams concerning the Sonoran Desert Conservation Plan.* Brief highlights of my education and career are enclosed.

I have returned home to Tucson recently, after a sabbatical year at Harvard's Kennedy School of Government, receiving a masters degree in public administration this past June. The Sonoran Desert Conservation Plan appears to be a good opportunity to apply the experience of my twenty years of law practice, my life-long interests in community affairs, and my brand new education in public policy. I come into the process without any particular ax to grind, but consider myself a stakeholder as a member of the community and an owner of property both in town and on the outskirts. I am interested in a balanced and fair solution for the long-term benefit of our whole community, and with minimal short-term hardships.

My perspective may be reflected in personal and professional involvements in a variety of modest realty and development projects in Pima County, ranging from the historical rehabilitation of the Harry Arizona Drachman House, in accordance with the Secretary of the Interior's Guidelines, to zoning and development issues at both ends of the socio-economic spectrum. My family maintains a second residence on the Negrito Creek, in New Mexico's Gila National Forest, near the release area for the Mexican Gray Wolves. The Negrito is one of the targets of the recent controversial settlement between the Southwest Center for Bio-Diversity and the U.S. Forest Service, giving us a sensitivity to the importance of riparian corridors, and placing us squarely between environmentalists and neighboring ranchers. The area also has been a hotbed for the Mexican Spotted Owl controversy with the timber industry, so we have been witness to both the destruction of the forest by industry, and the destruction of the local economy by conservation. *I am anxious to help develop better ways.*

Thank you for your courtesy and consideration. I look forward to hearing from you.

Sincerely,



Laurence Marc Berlin

cc: Maeveen Behan
Supervisor Sharon Bronson
Supervisor Mike Boyd

Laurence Marc Berlin

Professional and Academic Highlights

Academic

1998, *Master of Public Administration*, Harvard University, John F. Kennedy School of Government's Program for Mid-Career Professionals.

1977, *Juris Doctor*, University of Arizona, College of Law.

Arizona Law Review, 1975 - 1977.

Law Clerk to Arizona Attorney General Bruce Babbitt, summer 1976.

Arizona Legislative Fellowship, Law Intern to House Judiciary Committee, 1976 Legislative Session.

1972, *Bachelor of Arts*, Goddard College, Plainfield, Vermont.

Goddard's unique 'community oriented' and 'problem-solving' work-study program enabled use of a broad range of resources and experiences. Studies on campus in the Green Mountains of Vermont were augmented by field studies while living in an Indian Village on the south coast of Mexico and in Kyoto, Japan; by service on policy making and administrative committees of the college; and by volunteer work with the State Police.

Professional

Admitted to the State Bar Associations of California, 1979; Arizona, 1980; Nevada, 1987; and New Mexico, 1988.

Throughout twenty years litigating, I have tried to be a catalyst for improvement in the way large, powerful corporate and government entities treat relatively small, powerless individuals. My guiding principle has been the advancement of public safety and health themes, while advocating the specific interests of seriously injured clients and their families. My legal work has given me experience working with government bureaucracies, and in managing and coordinating multi-disciplinary groups of experts in fields including engineering, human factors, economics, business management, several medical specialties, psychology, social work, geology, etc. Highlights include:

- An innovative civil rights case, seeking class-wide relief for the dual purposes of reforming the State of Arizona's foster care system and compensating children who were sexually abused while in that system.
- Overcoming the United States government's claims of immunity based on "political, economic or social policy" considerations involved in the design and maintenance of dangerous conditions at the Hoover Dam. The case touched on competing policy considerations concerning the surrounding protected lands, and resulted in heightened awareness and commitment to visitor safety at the dam, including construction of safer pathways for pedestrians and encouraging commercial traffic to use safer alternative routes.

- Effecting heightened standards of corporate management for protection of the public. Examples include:
 - 1) The case of a child who suffered anaphylactic shock, resulting in a persistent vegetative state, due to his HMO's prioritization of business management procedures over medical safety procedures. I convened a "Blue Ribbon Panel" of medical experts, resulting in an insurance industry "alert" to its doctors and medical service companies, improving the "corporate medicine" standard of care.
 - 2) The case of a pedestrian who was catastrophically brain injured by a drunk driving beer salesman. The case resulted in improvements in the company's personnel management and provision of alcohol rehabilitation programs, and enhancement of a national campaign against drunk driving.
- *Pro bono* creation of the forms and procedures to implement a State Bar Association's new Rule of Professional Conduct, acknowledging an attorney's substance abuse as a "disability" as well as a "disciplinary" problem. The purpose of the program was to protect the complex web of interests, including the clients' affairs, rehabilitation and discipline of the attorney, the integrity of the bar, and the efficiency of the courts.
- Negotiation of an Alternate Dispute Resolution that successfully concluded dozens of claims concerning the infamous Dalkon Shield IUD. That ADR later became a model for the efficient administrative resolution of thousands of injured women's claims.

Prior to law school, I was employed by Arlen Realty Management, Inc., which sent me throughout the country for training and experience in a variety of realty management settings.



Charles H. Huckelberry
Pima County Administrator
130 West Congress
Tucson, AZ 85701-1317

December 15, 1998

Rodger Schlickeisen
President

Dear Mr. Huckelberry,

In the wake of Secretary Babbitt's auspicious visit to Pima County, I wish to add my voice in commending you and your staff for displaying bold leadership in working with a broad spectrum of environmental and community interests in developing the draft Sonoran Desert Conservation Plan (SDCP). You would be justified in taking a short break to revel in what has been accomplished to date. However, the task will only get more difficult and the next steps in the planning process are among the most crucial for ensuring that the SDCP will be successful in protecting biological diversity and quality of life in Pima County. I am writing to offer my staff's assistance over the coming months in developing this plan and to provide you with a framework of Defenders of Wildlife's goals in relation to the cactus ferruginous pygmy-owl and the broader Sonoran desert ecosystem.

Defenders has been active in the Southwest for quite some time now. We played a key role in seeing the Fish and Wildlife Service's Mexican wolf reintroduction program through to fruition and continue our active support for the program. Defenders has also been at the forefront of efforts to reform management of the lower Colorado River and has embarked on a broad campaign to promote, shape and implement ecosystem management of the Sonoran desert in Arizona, California and northern Mexico.

And, as you know, Defenders of Wildlife has been involved in protecting the pygmy-owl since before it was listed as an endangered species in 1997. To date, our efforts have focused on legally protecting the pygmy-owl from its greatest threat: loss of habitat. Indeed, we believe that this elusive owl has spurred the ambitious planning process now underway to protect the entire gamut of natural resources in Pima County. Although the SDCP promises to be important for enhancing the quality of life for Pima County residents and protecting a variety of habitat types, it also will largely determine whether the pygmy-owl will survive and recover in Arizona. In the final analysis, Defenders is committed to aggressively protecting the core population of pygmy-owls in the northwest Tucson area as part of a future viable regional population.

The next steps that Pima County takes in developing its plan are among the most important and will determine whether there is an opportunity for your ambitious effort to succeed. As you turn to gathering biological information, it is essential that this biological research and analysis be as independent as possible to ensure accuracy

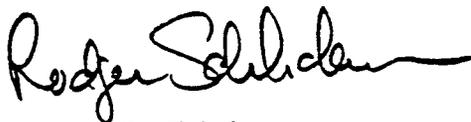
1101 Fourteenth Street, NW
Suite 1400
Washington, DC 20005
Telephone 202-682-9400
Fax 202-682-1331
<http://www.defenders.org>

and to build all stakeholders' confidence in the basis of the plan. I understand that the County soon will be selecting biologists to perform habitat assessments for the pygmy-owl and other species. The most qualified individuals for this work are independent, academic scientists. Unlike biological consultants, academic scientists do not have a financial conflict of interest because they do not work for local developers. Particularly for the pygmy-owl habitat assessment, it is vital that the biologist be an independent, academic scientist who will gather data in a rigorous manner that can stand up to peer review and stakeholder scrutiny. Further, it is vital that the scientists working on the habitat assessments coordinate closely with the Arizona Game and Fish Department, Region 5, and their efforts to study and protect the pygmy-owl.

Lastly, I would like to request a meeting of your and Defenders' staff to discuss in detail how we can best work together over the next few years to accomplish our goals, as well as better understand each others' priorities. Although there will likely be many instances where Defenders will push for stronger conservation measures than other stakeholders may support, it is obviously important that the lines of communication stay open. Once again, Defenders of Wildlife commends you for your commitment to conservation of the Sonoran desert. Please contact our regional coordinator, Andra Ewton (520-882-0292), if you wish to set up a meeting with Defenders staff.

We look forward to meeting the challenges that lie ahead.

Sincerely,



Rodger Schlickeisen
President

cc: Maeveen Behan

Sierrita Mining & Ranching Co.

Wednesday, December 16, 1998

MR C.H. HUCKLEBERRY
COUNTY ADMINISTRATOR
130 W CONGRESS ST, 11TH FLOOR
TUCSON AZ 85701

RE: SONORAN DESERT CONSERVATION PLAN

Dear Mr. Huckleberry,

Please be advised that we have read the draft form of the Sonoran Desert Conservation Plan. Since the proposed Sierrita Mountain Park will directly affect us, we want to go on record as opposed to the plan as written.

In the plan it is stated that public input was sought and received. In fact, no one ever asked us for our input and we are a stake holder in this issue. The plan also stated that a "coalition of environmental lawyers" formulated the basis for this plan. We demand to know who the lawyers are in this coalition who are affecting our future. It appears you think that they know more about this property than we do.

We, the Sierrita Mining & Ranching Co., are engaged in ranching on private, federal, and State Trust Land. We run 300 head of cattle on this ranch which consists of roughly 30 sections. Water has been developed over the entire ranch, which is beneficial not only for the wise use of its range but also to wildlife which we've attracted in abundance. Overall, our rangeland is in excellent condition. As long as the State Trust Land we lease for grazing is left in that category, there will be no development on it. Why then are you trying to buy it to stop development? It is simple and much less costly to keep this State Trust Land as it is now. As to our private land, it is not now nor will it ever be for sale in our lifetimes. In addition to grazing, there are a number of acres for homesites for family members. There are 100 families now living in this community which dates back to the 1800's and is older than most of present Tucson. It is an historic site rich in character and diversity.

Although our mining interest is limited, Sierrita Mining & Ranching Co. has retained, at great expense and for nearly a century, ownership of numerous mining claims. Other than ranching, our other endeavor is construction. Due to our understanding of the sensitivity of the environment, along with careful construction practices, we have been called upon to work throughout Arizona for many companies in remote areas. In Pima County we are currently working at the Observatory on Mt. Hopkins for the Smithsonian Institution and on Mt. Lemmon constructing a new ski lift. We have numerous other projects in progress. Construction is a field in which we are well recognized and respected.

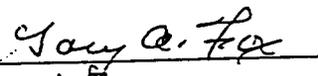
Sierrita Mining & Ranching Co.

Six generations of people have lived and worked on this ranch. We believe that would qualify as historical. These people are all law abiding citizens who vote and we are dumbfounded by your efforts to take away our way of life.

We share our ranch property with others: hikers, birdwatchers, picnickers, hunters and others already use the Sierrita Mountains. Why then are you attempting to spend huge amounts of taxpayer money to buy access to something that has, for a century, been accessible?

We would be open to a meeting with you to discuss this issue. We are eagerly waiting for your response.


Lynn C. Harris
Managing Partner


Gary A. Fox
Managing Partner


David L. Harris
Managing Partner

Copies: Mike Boyd, Chairman, District 1
Dan Eckstrom, District 2
Sharon Bronson, District 3
Ray Carroll, District 4
Raul Grijalva, District 5
Jane Dee Hull, Governor
Keith Bee, State Senator
Lou-Ann Preble, State Representative
Jake Flake, State Representative
Bill McGibbon, State Representative
John McCain, Senator
Jon Kyl, Senator
Jim Kolbe, Congressional Representative
Ed Pastor, Congressional Representative
Dennis Wells, State Land Commissioner

C.H. Huckleberry
County Administrator
130 W. Congress St. 11th floor
Tucson, Az. 85701

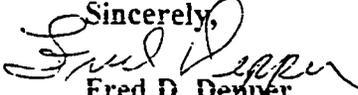
Dear Mr. Huckleberry

After reading the draft of the Sonoran Desert Conservation plan that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interest of the taxpayers, Ranchers, or wildlife. I work on a ranch in the Sierrita Mountains, we have always worked very hard to manage this ranch, to improve the water and grasses. Not only do our cattle benefit from our management program, the wildlife also benefits from water sites developed and the grass we plant. The salt and feed blocks that we put out, are shared by cattle and wildlife alike. We don't over graze our pastures, in fact we plant grass seed when we disturb the ground.

This ranch was started in 1895 by a group of families heading for California. They broke a wagon wheel and decided to stay here, and is know now as McGee Ranch. These families are survived by their decedents over one hundred families still live on the ranch, we work together on the ranch and with our construction company. When our forefathers first started this ranch the wildlife were very few, because there was very little water. We have developed many springs, and dams over the last one hundred and three years. Now there is a lot more wildlife on the ranch than there was when the ranch was first started. The Old Timers told stories of how they would go for days without seeing any game, now even after a drought year you can see a lot of game.

The question is why now do we need the Counties conservation plan? Because we are already managing the land at no cost to the taxpayers and as well as the County. The mountain part of the ranch is under restricted auto access although open to hikers, horse backers, and motor bikes. The lower part of the ranch is open for all access.

I would like to invite you to come and visit our little community and see for yourself that the need for a park does not exist in the Sierrita Mountains. Because the park that everyone is talking about is already here at no cost to the taxpayers. At last I would like to leave you with one thought, **MAYBE THE RANCHER IS THE ENDANGERED SPECIES!** And should be protected!!!

Sincerely,

Fred D. Depper
McGee Ranch
H C 70 Box 4526
Sahuarita Az. 85629

Southwest Center
for
Biological Diversity

protecting and restoring the southwest's deserts, rivers, forests, and wildlife



Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

December 17, 1998

Re: Sonoran Desert Conservation Plan, MSHCP Steering Committee

Dear Mr. Huckelberry:

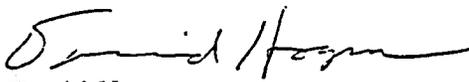
It is my understanding that you are now in the process of establishing a Steering Committee to coordinate development of a regional Pima County multiple species habitat conservation plan. As you know, the Southwest Center has worked closely with the Coalition for the Sonoran Desert Protection Plan and representatives of the County in an effort to ensure regional protection of the pygmy-owl and other sensitive natural resources. With this letter, I wish to convey interest by the Center in formal participation on this Steering Committee.

As indicated during our meeting of November 30, the Center and others are concerned that steps be taken by the County and Fish and Wildlife to ensure that all decisions by the Steering Committee be truly representative of the opinions and concerns of all participants. We also conveyed our concern that the Technical Advisory Committees be made up of independent experts and/or agency personnel with responsibility for relevant committee subjects. For example, we suggest that participation by biologists from Fish and Wildlife, Game and Fish, the University of Arizona and the biological consultant in a biological technical advisory committee would be appropriate. In another example, personnel from participating federal agencies would perhaps be most qualified to achieve the goals of a NEPA committee. I reemphasize these points at the risk of repetition due to negative past experiences with other similar programs.

In response, you conveyed similar concerns and a commitment that decisions by the Steering Committee would be achieved only by consensus. I genuinely appreciate this commitment.

If invited, I will be the Center's representative to the MSHCP Steering Committee. Please contact me at 623-5252 x.307 if you have any questions regarding this letter. Thank you for your consideration.

Sincerely,


David Hogan



P.O. Box 16233
Tucson, AZ 85732-6233
520-327-4210

December 17, 1998

Mr. Chuck Huckelberry
Pima County Administrator
130 West Congress, 10th Floor
Tucson, Arizona 85701
520/740-8751 (tel.)
520/740-8171 (fax)

Re: **Sonoran Desert Conservation Plan**

Dear Mr. Huckelberry:

The Metropolitan Pima Alliance is an organization of real estate-related companies and organizations representing over 700 companies and over 30,000 individuals in eastern Pima County. We have had an opportunity to read the Sonoran Desert Conservation Plan and are responding to your public request for comments on the plan.

First, I would like to congratulate you and your staff on assembling a document which provides the most comprehensive look at past efforts, current projects and potential future projects for cultural and natural resource conservation, preservation and restoration that we have seen assimilated in any location. This plan advocates maintaining, enhancing and ensuring for current and future generations a high quality of life. This is a goal that all of us in the community share.

While the Sonoran Desert Conservation Plan outlines many laudable goals, it seems to have an underlying presumptive theme that all urbanization is bad. The inherent contradiction in this theme is that most of us would not live, work and play in the metropolitan area if it were not urbanized. The principles advocated in the document seem to suggest that preservation, conservation and restoration are of paramount importance, regardless of the cost.

A plan of this scope and magnitude will have significant impact upon the Pima County Comprehensive Plan. The Sonoran Desert Conservation Plan needs to be studied and implemented in conjunction with a comprehensive plan update. It should also be judged in

the context of its influence on long-term economic vitality of the region, transportation planning and infrastructure, water resources supply and demand, public services and facilities and long-term public funding requirements and sources. While the Sonoran Desert Conservation Plan does a good job of listing currently identified funds and opportunities for obtaining additional funds, it does not provide more definitive conceptual estimates of the cost of total implementation of the plan, nor a specific representation as to what cost each individual or household within Pima County will be expected to bear and over what time frame. This plan is a good starting point to examine these financial implications.

Before it is implemented, it is important for the general public to understand the range of possibilities with a more specific outline of the timeline and specific dollars required—in other words, a proforma of the projected impact on the community. A conceptual cost benefit analysis would be helpful in order for the average taxpayer to make a value judgment for implementation of the plan. For example, if this plan is implemented to its fullest, what is the projected population capacity of eastern Pima County? What infrastructure per capita will be required? What will it cost the taxpayers to maintain this infrastructure as compared to the projected conditions without implementation of the plan?

By pursuing the evaluations outlined above, it will help to ensure that a plan is developed which is actually achievable and not merely a “feel-good” public policy. We have all seen examples in the past of “feel-good” policy decisions. If a detailed, achievable plan is not outlined to achieve the vision presented, the vision will certainly not materialize. A similar public policy analogy is recycling. While all of us want to recycle to conserve natural resources, there is not sufficient public and private infrastructure to actually recycle the materials being collected from recycle bins. A major portion of this material still goes to the landfill; even though recycling makes each one of us feel good, it is not yet a practical economic reality.

There are several good land-use policy ideas listed in the implementation section of the plan. One of the best ideas is transferable development rights. We should put our thinking caps on and come up with other methods to provide incentive for conservation and restoration. We are concerned that two of the suggested land-use policies are primarily punitive (the environmental enhancement fee and the environmental banking authority). It seems that we have gotten into a mode of assessing fee on top fee without regard to cost to the end consumer and its impact on the local economy.



P.O. Box 16233
Tucson, AZ 85732-6233
520-327-4210

In summary, it is our opinion that the Sonoran Desert Conservation Plan as outlined is a good starting point, but certainly not a plan to be adopted "as is" without additional work to develop a more definitive implementation plan and economic justification. We appreciate this opportunity to provide comment, and hope that we can provide additional constructive input as this process proceeds.

Sincerely,

METROPOLITAN PIMA ALLIANCE

A handwritten signature in cursive script that reads "Tim Terrill".

Tim Terrill
President

T:\Admin\5528\TLT\huckelberry.doc

- c: Mike Boyd, Pima County Board of Supervisor, District 1
Dan Eckstrom, Pima County Board of Supervisor, District 2
Sharon Bronson, Pima County Board of Supervisor, District 3
Ray Carroll, Pima County Board of Supervisor, District 4
Raul M. Grijalva, Pima County Board of Supervisor, District 5



7650 E. Broadway Blvd.
Suite 203
Tucson, AZ 85710
Telephone (520) 290-0828
FAX (520) 290-0969
sonoran@sonoran.org
www.sonoran.org

Sonoran Institute

December 18, 1998

Chuck Huckelberry
County Manager
Pima County Governmental Center
130 W. Congress
Tucson, AZ 85701

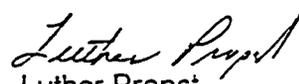
Dear Mr. Huckelberry:

Congratulations on your fine work in developing and building broad support for the Sonoran Desert Conservation Plan. The conservation plan provides a critical framework for the Pima County community to effectively address the full range of conservation, economic development, and growth management needs.

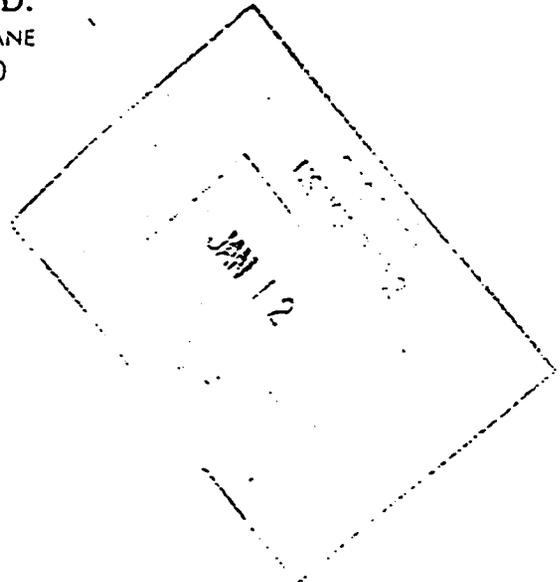
I would be pleased to help make this plan a reality. In particular, I would like to volunteer to serve on the steering committee for the proposed Multi-Species Habitat Conservation Plan. My experience locally with the expansion of Saguaro National Park and throughout the West with a wide variety of community-based conservation efforts may add a valuable perspective to the steering committee.

Best regards.

Sincerely,


Luther Propst

RICHARD ROSEN, Ph.D, J.D.
6951 EAST QUIET DESERT LANE
TUCSON, ARIZONA 85750
FAX (520) 544-8911



December 21, 1998

Interior Secretary Bruce Babbitt
Department of the Interior
1849 C. St., N.W.
Washington, D.C. 20240

RE: Pima County Protection Plan

Dear Mr. Babbitt:

I am delighted that you support the Pima County Board of Supervisors' plan to acquire land for the purpose of conserving wildlife habitats and the beauty of this part of Arizona. As you know, the unique beauty that draws so many to this area must be preserved. Every citizen I have talked with about this topic agrees.

I believe that your support will go a long way toward achieving these goals. I laud your efforts. It is heartening that a federal government official endorses our local government's plan.

Mr. Babbitt, you have a long history of caring for the future of the world in which we live, and, as a constituent of your home state, I appreciate your support in word and deed.

Sincerely,

A handwritten signature in cursive script, which appears to be 'Richard Rosen', is written over the word 'Sincerely,'.

Richard Rosen, Ph.D., J.D.



TOWN OF MARANA

December 22, 1998

C. H. Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

Dear Mr. Huckelberry:

The Town of Marana appreciates your invitation to comment on the Sonoran Desert Conservation Plan. A review of the draft report finds it to be a very comprehensive regional based environmental conservation plan addressing the diverse biological, cultural and historical attributes of eastern Pima County in a context of extreme growth pressures. The Town is in agreement that the Conservation Plan represents a unique opportunity for a successful partnership of all stakeholders within the regional planning area to address long-term solutions to commonly held conservation issues which will ultimately benefit our Sonoran Desert environment and the local economy.

Not unlike Pima County and other local jurisdictions, the Town of Marana faces many of the same environmental challenges. These include balancing a dramatic population increase and housing unit expansion with the conservation of community resources and a large availability of land that can be developed to accommodate urbanization. The Town must deal with some endangered species issues, an evolving community identity which integrates Marana's historical and cultural heritage, and the desire to create, preserve and/or maintain flood-prone lands, unique natural areas, scenic vistas, and diverse plant and animal populations.

The Town of Marana has evaluated the draft Conservation Plan against the policies contained in the General Plan and with the Future Land Use Plan Map and finds that, for the most part, the documents are compatible. If population projections are correct, Marana's greatest period of growth is just ahead. Marana recognizes its asset as a place to live. It is the living environment - scenic, accessible and secure, that draws development. Among the locally held values

that guided the preparation of the General Plan are keeping a small town feel and preserving the spaciousness and scenic views that characterize the Town.

The Land Use Element of the Town's General Plan identifies as its first goal the Practice of Environmental Sensitivity. The General Plan affirms that "a proactive stance toward protecting the natural environment is regarded as one of the General Plan's most essential aspects, where the proposition that recommending where not to develop is as important as designating areas where development should occur." "Sound environmental stewardship means designating some lands to be off limits for development or, at least, reasonably restricted so as not to injure sensitive habitats, destroy archaeological sites or impair public enjoyment of scenery and space." Supporting politics reflect (1) the designation of non-development areas; (2) protection of air and water resources; (3) preservation of the Town's rich agricultural land, native plants and habitats; and (4) enactment of mountain and view preservation measures. The General Plan strongly encourages actions which implement programs for open space acquisition and standards for preservation of natural resources as well as the adoption or improvement of regulatory provisions that prevent intense development on sensitive lands.

The General Plan reflects that "there is and will continue to be a broad spectrum of space utilization in town, at one extreme, the very exurban reaches of mountains, foothills and floodplains which are virtually undevelopable and, therefore, are best left as natural open areas." Implementation strategies include the adoption of "functional plans for incorporating open spaces, sites with archaeological value and heritage value and natural habitats into Marana's future development pattern as a next step toward respecting the environment."

In addition to the General Plan, the Town recently completed a draft Park System Master Plan that will serve as the Parks and Recreation element of the General Plan. Although it is currently not yet adopted, this Master Plan also was reviewed for conformity with the Conservation Plan and clearly incorporates similar goals. Among these are "cooperation with appropriate federal, state and county resources management agencies related to the protection of designated parks, preserves and open space corridors and to acquire or use other measures to protect riparian/natural open space corridors within the community as well as to integrate elements of the Pima County Regional Trail System to provide access to natural open space where appropriate." The need to protect visual and biological resources valued by the community is given a high priority.

While it is evident that the goals and policies contained in the General Plan and Park System Master Plan support the draft Sonoran Desert Conservation Plan, potential conflict does exist between the draft Conservation Plan and Marana's

Future Development Plan Map specifically with respect to the degree of the proposed expansion of the Tortolita Mountain Park as represented in Figure 13 of the Conservation Plan. A substantial portion of the proposed mountain park expansion lying south of the current park boundaries impacts private property which is currently masterplanned and undeveloped. This property contained within the Dove Mountain Specific Plan represents a significant community amenity in respect to future resort/residential development. Secondly, although the Town recognizes that significant portions of State Trust Lands identified for proposed mountain park expansion are properly designated, the General Plan does envision that areas may be appropriate for development. These areas, although not necessarily to the extent shown on the Future Development Plan, are specified as a Community Development Zone, an opportunity area that may be appropriate for resort/residential masterplanning. In this area, neighborhood cluster development could accommodate shopping, employment and recreation to serve nearby residences, buffered by low-density residential development. These self-contained neighborhood clusters are an especially important precept to Marana to prevent sprawled development and to support the Town's management objective of creating relatively self-sufficient neighborhoods. Furthermore, this particular vicinity of Marana's planning area encompasses numerous elements critical to the Town's future planning efforts. These include key segments of proposed road networks (the northeast portion of the Marana Loop Road) providing community connectivity, drainage improvements, flood control projects and potential municipal administration facilities. It is expected that these land use conflicts can be minimized or resolved with further refinements of the Conservation Plan and amendment of the General Plan.

Even to a greater degree than the conflict with the scope of the proposed expansion of Tortolita Mountain Park, the Conservation Plan provides an opportunity that I don't believe was adequately represented. Specifically, the Town of Marana sees a tremendous opportunity to place great emphasis on the Santa Cruz River as a venue for a multi-faceted approach to parks and recreation, water resource management, wildlife corridor and critical habitat development, and economic development. We invite the County to participate with us in focusing resources toward developing the Santa Cruz River within the Town of Marana as a vehicle for providing areas of enhanced critical habitat with connecting wildlife corridors, while examining its role as a potential venue for enhanced beneficial water use. I respectfully request that the Conservation Plan place more priority on the Santa Cruz River corridor for designation of resources.

Finally, I believe that greater recognition should be given to the potential of relieving pressure within designated critical habitats by encouraging or guiding development in environmentally appropriate areas. In regard to the Town of Marana, we believe that the more ways we can encourage development to move

into the corridors of flat non-vegetated farmlands, the better off the region will be toward preserving more environmentally sensitive areas and ensuring adequacy of renewable water supplies. However, the public must recognize that in order to encourage appropriate growth, the infrastructure must be made available in terms of sewer if we are to be successful and truly provide an integrated approach. While the Town recognizes the need to establish priorities and steer growth away from sensitive areas and provide disincentive to development in those areas, we also believe it would be appropriate and essential to provide incentive to develop in other areas to facilitate managed growth.

Careful analysis is required of the anticipated impact of the draft plan on developable land around the Tucson basin and how such plan will mesh with other state and federal public land plans as well as with the General/Comprehensive Plans of impacted jurisdictions that have put significant effort into defining their vision and character. As a stakeholder, the Town of Marana will certainly be interested in participating in the ensuing planning effort and looks forward to entering into a cooperative agreement with the County and other parties.

In conclusion, the Town's General Plan and Park System Master Plan reflect conformity with, and generally support adoption of, the Sonoran Desert Conservation Plan. I feel it is a much-needed impetus to provide a long-term blueprint.

Again, the Town appreciates the opportunity to review and comment on the draft Conservation Plan. If you have any questions or require additional clarification, please contact me.

Sincerely,



Michael C. Hein
Town Manager

cc Mayor and Council
Jerry Flannery
Maeveen Behan
Byron Howard

December 22, 1998

Chuck Huckelberry
County Administrator
Pima County Government
130 W. Congress
Tucson, Arizona 85701-1317

Dear Mr. Huckelberry,

Firstly, I would like to thank you for your leadership on the development of the Sonoran Desert Conservation Plan. I believe we are ready in Pima County for such a plan. Thank you again for taking the initiative.

Secondly, I would like to put my name on the list of interested people to assist with the development and citizen oversight of the conservation plan.

Respectfully,

K. M. Hiller

Kate Hiller
916 S. 5th Ave
Tucson, Arizona 85701

Phone:
623- 5736 (evening)
623-5111 (day)

Mr. C.H. Huckleberry
County Administrator
Pima County, AZ

Dear Mr. Huckleberry,

Please be advised that we have read the draft form of the Sonoran Desert Conservation Plan that was presented to the Pima County Board of Supervisors for approval. Since the proposed Sierrita Mountain Park will directly affect us, we want to go on record as opposed to the plan as written.

In the plan it is stated that public input into the plan was sought and received. Well, no one ever asked us for input and we are a stake holder in this issue. The plan also stated that a "coalition of environmental lawyers" formulated the basis for their plan. We want to know what groups or individuals make up ^{this} their coalition. It appears you think they know more about this property than we do.

We, the Sierrita Mining & Ranching Co., are engaged in ranching on private ^{and} ^{trust} state land. We run 300 head of cattle on this ranch. Water ^{which is situated in 30 sections} has been developed over the entire ranch which is beneficial not only for the wise use of it's range but also to wildlife which is in abundance. Overall, our rangeland is in excellent condition. We wonder why ~~this ranch was not included in your plan as a "ranch to be preserved" as were other area ranches.~~ As long as the State Land Trust Land we lease for grazing is left in that category, there will be no development on it. Why then are you trying to buy it to stop development? It is simple and much less costly to keep this State land as it is now. As to our private land, it is not now nor will it ever be for sale. In addition to ^{we} grazing ^{there} are a number of acres for homesites for family members. There are 100 families now living in this community. This community dates back to the 1800's and is older than most of present Tucson. It is not a wildcat subdivision but a historic site ^{with in area and diversity}

Sierrita Mining & Ranching Co is no longer involved in mining although we retain ownership of numerous mining claims. Other than ranching our other endeavor is construction. Our specialty is construction in remote areas. We have worked all over Arizona for many companies. In Pima County we are currently working on Mt Hopkins for the Smithsonian Institution and on Mt Lemmon constructing a new ski lift. We have nu-

merous other projects in progress. We are a well recognised and respected construction company.

Six generations of people have lived and worked on this ranch. We believe that that would qualify as historical. These people are all law abiding citizens who vote and we are dumbfounded by your efforts to take away our way of life.

We share our ranch property with others. Hikers, birdwatchers, picnickers, hunters and others already use the Sierrita Mountains. Why then are you attempting to spend huge amounts of taxpayers money to buy something that ~~you already have?~~ *the public already has access to*

We would be open to a meeting for you to explain your position on this issue and to listen to ours. *Please advise at your earliest convenience*

Sincerely,

Lynn Harris
Sierrita Mining & Ranching

Copies : Mike Boyd, Chairman, District 1
Dan Eckstrom, District 2
Sharon Bronson, District 3
Ray Carroll, District 4
Raul Grijalva, District 5

*Gov. Jane Hull
State Land Commissioner*

*I live here too -
Lucille Depper
HC 70-4525
Sahuarita, Az.
85629*

*How can you allow this
natural park to be ruined.*

Pima County

Open Space Acquisition Review Committee

1204 W. Silverlake Rd., Tucson, AZ 85713 (520) 740-2690 Fax: (520) 623-3539

Co-Chairs: Kate Hiller - 623-5736; Gayle Hartmann - 325-6974

23 December 1998

Charles Huckelberry, County Administrator
Pima County
130 W. Congress
Tucson, AZ 85701

Dear Mr. Huckelberry,

We are writing on behalf of the Pima County Open Space Acquisition Review Committee to let you know that we heartily endorse the Sonoran Desert Conservation Plan. We are pleased that it takes such a comprehensive approach that includes land of several different types. In addition, we believe that the two-pronged attack of acquisition combined with regulation is the only way to approach the problem of desert protection and controlled growth.

We realize this is a complex plan that will not be achieved overnight, nevertheless we urge that the County move as quickly as possible. As you know, land prices only go up, and at the rate at which development is occurring much of the land designated for purchase will be available for only a short time. We would like to reaffirm what is already well known; that is, money for purchasing open space must be a number 1 priority for Pima County. In addition, we believe open space purchases must be part of a comprehensive program that should be managed by a County Open Space Administrator.

Finally, we are very pleased that Secretary Babbitt is sufficiently interested in the Pima County Plan to come to Tucson and offer his support. Clearly, federal funding will be very important, especially in connection with a U.S. Fish and Wildlife Service-approved plan for pygmy owl preservation. We urge the County to keep in contact with the Secretary's office as well as with our Congressional delegation.

As a County committee created to review open space acquisitions, we hope we can continue to be involved and play a useful role in the successful completion of the Sonoran Desert Conservation Plan.

Sincerely,

Gayle Hartmann
Gayle Hartmann

K. M. Hiller
Kate Hiller



P.O. Box 30326 Tucson, Arizona 85751-0326

26 December 1998

Charles Huckelberry, County Administrator
Pima County
130 W. Congress, 10th floor
Tucson, AZ 85701

Dear Mr. Huckelberry,

We are very pleased to be given the opportunity to review the draft Sonoran Desert Conservation Plan. Although the delay is certainly no fault of yours, it has been a long time coming. In our opinion, 1978 rather than 1998 would have been a much more auspicious time to begin this effort. However, we would rather begin now than not at all.

We would like to point out at the beginning that, far from considering too much land, the draft Plan is not nearly comprehensive enough. We recommend that a good exercise would be to calculate the amount of private and state land in Pima County not included in the Plan. Then, population estimates should be made for this land at existing zoning and at some reasonable higher density. We are certain this would reveal that there would still be enough land for an enormous number of people — far too many people for our roads, water supply, and air to accommodate.

We do have several comments regarding the draft. These are enumerated below.

1. **Generally, we believe the choices in the Plan for land acquisition are good ones.** Several, of course, are expansions of ideas that have been around for some years. We are glad to see new ideas such as ranch conservation and historic and cultural preservation. However, we do have a few thoughts regarding land acquisition.

— We suggest that lands currently in federal ownership, i.e., BLM, should remain in federal ownership. The best example is the proposed Silverbell/ Waterman-Roskrige Park (its name

varies from page to page). Since much of this land is already protected by the BLM, a better approach than changing it to County management and thereby incurring need for management paid by County taxes, would be to make it a National Conservation Area under BLM management. Several examples already exist such as Empire-Cienega, San Pedro, etc; all are doing well under federal management. We would recommend that, in general, if land can be managed in perpetuity by someone other than the County, that is the option that should be pursued.

— Land that is presently in private ownership and is being managed as open space, i.e., the McGee Ranch property in the Sierrita Mtns. should be considered for conservation easements rather than outright purchase. There will undoubtedly be many instances of owners who would like their lands to remain open and are not interested in selling. Rather than encouraging them to sell or condemning and taking on additional management costs, the County should pursue easements. In fact, we suggest that conservation easements are an extremely important mechanism that have not been considered in any detail in this plan.

— We suggest that the Biological Corridors and Links section needs to be broadened considerably. A few examples of areas that should be included are washes and bajadas on the west side and northeast side of the Sierrita Mtns., washes north of the Santa Rita Experimental Range and the Santa Rita District of the Coronado Natl. Forest, washes on the northeast side of the Tucson Mtns., and washes that drain into Cienega Creek. In the case of the Sierrita Mtns., we believe that an archaeological district exists on the northwest side of the mountains that should be included in the draft Plan.

In addition, we note that nowhere in the Plan is there mention of Tanque Verde Wash. Some money for land purchase is available from the recent open space bond, but it is insufficient to buy very much. We believe a comprehensive plan for the protection of Tanque Verde Wash needs to be devised. Such a plan should combine purchase with conservation easements.

2. We believe the **draft Plan needs to be broadened to include what we are calling the "Inner County."** The draft Plan does a relatively good job of proposing land conservation around the County's perimeter, but completely ignores areas closer to the City limits. Some of the best examples are Sabino Canyon, the eastern slopes of the Tucson Mtns. near Gates Pass, the area along Ajo Way, and parts of the Avra Valley. These are areas where either scenic and biological values are high and/or transportation corridors are already nearing or are over capacity and there are few if any options for serious road widening. We understand that largely these are areas where acquisition would be expensive, and we also understand that existing zoning plans present problems that are difficult to solve. Nonetheless, we think key parcels should be targeted for purchase and that regulatory mechanisms should be carefully considered. We suggest that, taking Sabino Canyon as an example, a useful exercise would be to look at the available zoning in these areas, see how many people and cars that translates into and then calculate what that will do

to the already overcrowded transportation corridors. We strongly believe that road widening is at best a poor solution and at worst an impossible solution; it is always an extremely disruptive and expensive solution. Figuring out a way to limit the increase of population in these areas would be much more sensible.

3. We appreciate the fact that you have included recommended changes in land use policy. At the same time, we believe this area of the draft Plan must be seriously strengthened. We have the following comments:

— We strongly agree that there should be no upzoning in environmentally sensitive or historic areas. Indeed, considering that there are thousands of acres already zoned for high density that are empty, we recommend that there should be no new upzonings. There are numerous cities and counties around the country (and these examples are increasing all the time) where upzoning is a rare experience. The norm is to deny upzonings. Denying upzonings needs to become the norm in Pima County. In particular, land that is designated as an environmentally sensitive or historically valuable area should never be upzoned.

— We believe that this community has reached the point where every upzoning considered by the Board is critical. We recommend that a better system be devised to publicize upcoming zonings so that members of the public beyond immediate neighbors can voice their opinion.

— We also strongly agree that review of subdivision requirements should be strengthened. What has recently occurred on the isolated hills near Sabino Canyon is a travesty. We thought such serious grading and reshaping of landscapes was a thing of the past; every effort should be made to see it does not continue.

— Rezoning time extensions should seldom, if ever, be granted. Five years is more than enough time to begin development; if that deadline cannot be met the land should revert to its previous zoning. We recommend that a sunset law be instituted.

— The loop hole regarding the 300-foot limit around the perimeters of rezoning cases should be closed. That is to say, developers should not be allowed to pull their boundaries in 300 feet to avoid having the opinions of surrounding land owners be considered. This is such a flagrant avoidance of the intent of the law it is outrageous that it is still legal.

— Creating tax incentives to keep land in low density uses needs to be a high priority item. We realize this is an issue the state must address, but again, other states have incentives to keep land in agricultural uses. There is no reason Arizona could not do the same to encourage land to remain in ranching or other non-intensive uses.

— We strongly agree that a program that allows the transfer of development rights needs to be created. This is, of course, another area where state approval is needed. And, once again,

numerous other states have these programs and could be looked to for guidance.

— The County should pursue its legal case against the state of Arizona regarding “downzoning.” Without the ability to zone in the direction of lower density as well as higher density, it will be extremely difficult to deal with problems in the “Inner County.” Large numbers of old, dense zonings are in place in areas with inadequate infrastructure. Downzoning is the only reasonable method for dealing with these cases. We must keep in mind that upzoning should not be considered as some sort of guarantee of increased land value. An individual who speculates on land takes a chance; he must be willing to lose as well as win.

— We recommend that the Plan include a limitation on the number of building permits issued each year. Again, this is a mechanism that has been used successfully in other states and we see no reason why it should not be used here. This could be done for a specified number of years, giving the County time to begin to put this Plan into place.

4. A regional oversight mechanism and involvement of other jurisdictions are both keys to the success of this plan. We know it is extremely difficult to create a regional oversight mechanism that does not become a stagnant, status-quo-maintaining bureaucracy. Nonetheless, in the long run, some such mechanism will be necessary. In our minds, a state-level agency such as Oregon has would be the best approach, but that seems unlikely in the near future. Failing that, a mechanism that includes, at minimum, all jurisdictions in Pima County is essential. The involvement of other jurisdictions is absolutely necessary. We recommend that serious efforts be made immediately to include the City of Tucson. It is especially important that Tucson be included in order that areas in the Inner County and outer edges of the City are included in the Plan. Certainly, if a “Human Ecology” Plan is to have any meaning and any chance for success, the City and the County must be partners.

5. Make the acquisition of open space and conservation easements a top priority for Pima County. The Plan recommends that large amounts of acreage in the County remain in open space. To do this successfully, the acquisition of open space will have to become a top priority with decisions for acquisition based on sound biological, cultural/historical and geographical factors. Our next recommendation (no. 6) should help achieve that goal.

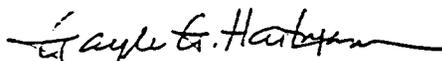
6. Rethink the mechanisms currently in place for buying open space and the choice of parcels that are being acquired. The 1997 open space bond money provided approximately \$29 million for the purchase of open space and \$6 million for the purchase of historic properties. We are concerned that, not only is the open space money inadequate, but the actual purchase of land involves an extraordinarily slow, cumbersome process that may not always choose the most important properties. For example, there are properties within and at the eastern end of Gates Pass that are steep, highly visible, densely covered with saguaros and highly deserving of remaining in open space. In fact, nearly all Tucsonans, we are sure, believe these lands to be

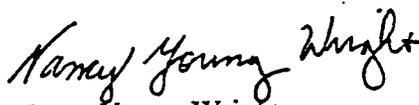
within Tucson Mtn. Park. They were removed from the list of properties to be acquired. We are sure that many, many people, both Tucsonans and visitors, will be appalled when the bulldozing begins. We would like to see the initiation of mechanisms that would ensure the purchase of important properties in a timely fashion.

To help solve these problems we recommend the County hire an Open Space Administrator who reports directly to the office of the County Administrator. This person's primary responsibility should be to oversee the acquisition and management of open space. Often before a parcel is purchased, other factors must be considered, such the availability of nearby parcels, accessibility, etc.; at present there is no single individual in the County whose responsibility it is to address these issues. As was pointed out in the *Arizona Daily Star*, among a group of cities and counties examined, Pima County ranks at the bottom in terms of amount of money spent administering open space. Although we do not want to raise those costs unnecessarily, an open space administrator is a necessity.

Finally, we would like to request that *Buffers* be given a seat on the proposed Steering Committee. We have been active in matters that relate directly to this Plan for over a decade and believe we have the knowledge and skill to be useful on the Committee. Please let us know of your decision. We can be reached at 325-6974 (Gayle) or 742-7283 (Nancy). Please address any response to this letter to Gayle Hartmann and Nancy Young Wright, 2224 E. 4th St., Tucson, AZ, 85719.

Sincerely,


Gayle G. Hartmann


Nancy Young Wright

for Buffers Steering Committee:

Dorothy Davis, David Elwood, Julia Gordon, Nancy Kelly, Doug Koppinger, Ellen Kurtz, Wendy Marcus, Richard McKee, Ted Schlinkert, Doug Shakel, Wanda Shattuck, Tom Vincent

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: *This will help to control the development of the Tucson Mountain Area, protect our community and our wildlife.*

My specific concerns regarding the Plan are:

Sincerely,

Linda Grogan

(Signature)

Linda Grogan

(Printed Name)

4812 W. TRAILS END RD

(Address)

TUCSON, AZ 85745

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: I'm interested in preservation
of our open spaces for low impact
recreational use: e.g. horseback riding,
hiking.

My specific concerns regarding the Plan are:

Maintenance of wildlife corridors

Sincerely,

Mary H. Tigerman (Signature)

Mary H. Tigerman (Printed Name)

3951 W. Sweetwater Drive (Address)

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments:

My specific concerns regarding the Plan are:

Sincerely,

Patricia G. DeWitt

(Signature)

PATRICIA A. DEWITT

(Printed Name)

421 E. WINDY PEAK CIRCLE

(Address)

*TUCSON, AZ
85704*

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments:

I applaud the forward-looking ideas contained in the plan. Somebody has to lead, & I hope the County continues to address the issues.

My specific concerns regarding the Plan are:

- ✓ historic conservation
- ✓ mountain parks
- ✓ corridor conservation
- ✓ habitat preservation

Sincerely,

Jay Forbes

(Signature)

Gary Forbes

(Printed Name)

6555 W. Banded Road

(Address)

Marcel and Olga Neuts
925, N. Smoke Tree Circle
Tucson, Arizona 85745

Phone: 520 884 9034
Fax: 520 884 7163
E-mail: mando@azstamet.com



December 27, 1998

Pima County Administrator
Attn: Ms. Maeveen Behan
RE: SDCP
130 W. Congress Street
Tucson, Arizona 85701

Dear Ms. Behan:

We are members of the Tucson Mountain Association and we enthusiastically support the Sonoran Desert Conservation Plan.

While we support all six elements of the plan, we are particularly concerned about the expansion of the Mountain Parks and specifically Tucson Mountain Park. The preservation of biological corridors will protect the habitat of our desert wildlife and encourage the subsistence of native plants and animals.

We applaud Mr. Huckleberry's initiative and we hope that our letter will be included in the official packet that he will submit to the County Supervisors.

Sincerely yours

Marcel F. Neuts

Olga T. Neuts

Olga and Marcel Neuts

Mr. Gary Fox
HC 70 Box 4258
Sahuarita, Arizona 85629

December 28, 1998

Mr. C. Huckelberry, County Administrator
130 W. Congress 10th Floor
Tucson, Arizona

Re: **Sonoran Desert Conservation Plan**

I would like to go on record opposing the taking of private land, as put forth in the Sonoran Desert Conservation Plan.

I am a fourth generation resident of McGee Ranch. I was raised on the ranch, watched the older ones as they strived to increase the water for the area. This was very hard work, they spent many hours developing water catchments over the Sierrita Mountains. This ranch is now very well developed with waterholes situated through out the mountains.

When my ancestors first arrived here, there was only seasonal water, except for two seeps of water located miles apart. Wildlife was almost nonexistent because there was no permanent water. Now according to range management officials this ranch is being managed very well. There is abundant forage for cattle and wildlife, with water supplied even if it means hauling in trucks during droughts or when water systems temporarily fail. Will the county supply water when it becomes necessary to sustain wildlife?

Now with pressure from environmental concerns, it seems that everything we have worked for is being taken away from us.

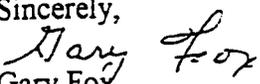
A letter to Lynn Harris Mc Gee Ranch, dated December 14, 1998, Mr. Huckelberry stated that "Pima County has no desire to acquire operating ranches". This is not the issue. It is stated in the Sonoran Desert Conservation Plan, the Sierrita Mountains are to be taken over as a County Park, and any land that is private will be condemned if the owners do not relinquish all their rights to their property.

This "taking" will remove land from the tax roles, reducing our income, we will be paying less in taxes also. This means you will raise taxes to cover the loss of revenue.

As a member of Sierrita Mining and Ranching Company, I can state, **we will not sell land to anyone. It is not for sale to friends, relatives or individuals, in or out of our organization. It is owned by Sierrita Mining and Ranching.**

We have not discouraged anyone from using the mountains for hiking, bird watching, hunting, horseback riding, etc. This plan seems to be a waste of money and resources the county does not have, to accomplish what is being done already.

Sincerely,


Gary Fox

c: The Honorable Sharon Bronson, Member, Pima County Board of Supervisors



Sky-Island Alliance

1639 E. 1st Street • Tucson, AZ 85719 • 602-792-2690 • 602-323-0547

December 28, 1998

Chuck Huckleberry
Pima County Administrator
130 W. Congress
Tucson, AZ 85701

Dear Mr. Huckleberry:

We have learned that you are putting together a steering committee for the county's Sonoran Desert Conservation Plan, and would like a seat at that table.

The Sky Island Alliance has long been a member of the Sonoran Desert Coalition and we support their goals, but we have a unique position in this region and can bring a broader perspective to the discussions. Our group leadership and many of our active members have long histories of involvement in local environmental organizations and issues. Some of us are also working biologists, and our team of scientific advisors includes some of the best biologists and ecologists in the country. Our focus is to promote a positive, long-term vision of better management and protection for the sky-island region, including southeastern Arizona, southwestern New Mexico, and the adjacent corners of Sonora and Chihuahua. Toward that end, we are several years into a process of using the insights of conservation biology to devise a scientifically credible nature reserve system for the region. This will consist of core wilderness areas connected by wildlife corridors and surrounded by stewardship zones which are associated with biologically-sound management recommendations. Some of these cores and corridors are very similar to areas shown in your initial draft of the Sonoran Desert Conservation Plan, as suggested by the conceptual map in the enclosed brochure.

Please give us the opportunity to apply our insights and experience to this process.

Sincerely,

Dale S. Turner
President, Sky Island

Alliance

ALLIANCE ACTION

... We are drafting a reserve design map and general stewardship plan for all of the management agencies, land owners, and other interested parties in the Sky Island/Greater Gila region.

... We encourage volunteers to participate in field surveys, mapping, wildlife tracking, and data synthesis.

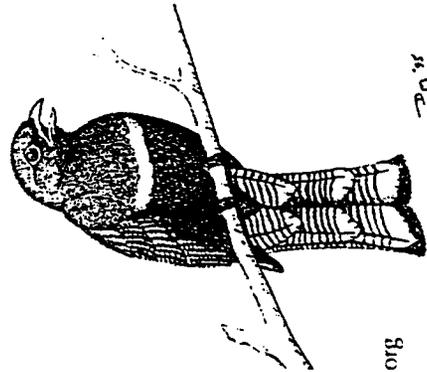
... Speakers are available to groups interested in learning more about the area and the Alliance.

... We also publish a quarterly newsletter.

SKY ISLAND ALLIANCE IS FUNDED THROUGH GRANTS AND MEMBERSHIPS.

We need your help!

Please send membership donations to the Tucson office. (\$15 for regular membership)



Thanks to: Doug Moore for drawings of bat, trogon, snail; Helen Wilson for gray hawk

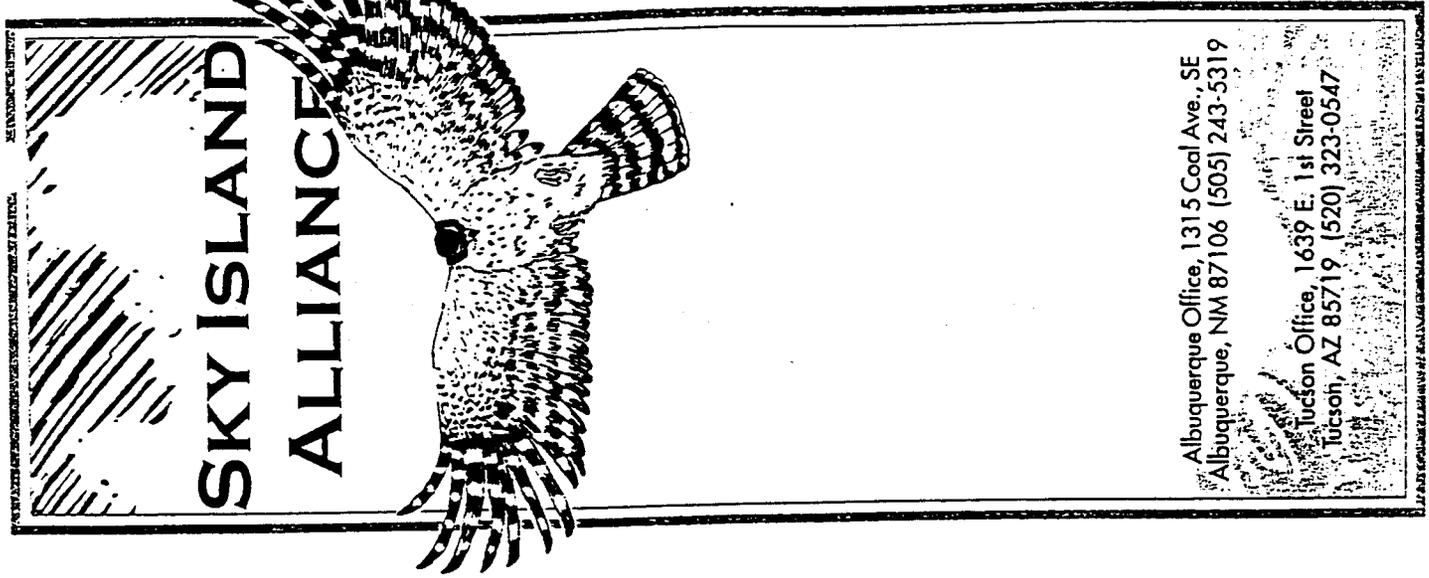
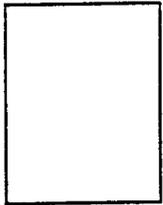
Tucson
E-mail: antabla@igc.org

Albuquerque
Fax: (505) 243-3477
E-mail: skisland@lobo.net

Visit our website at <http://www.lobo.net/~skisland> for the latest newsletters and reserve design information.

SKY ISLAND ALLIANCE
1639 E. 1ST STREET
TUCSON, AZ 85719

 printed on recycled paper



Albuquerque Office, 1315 Coal Ave., SE
Albuquerque, NM 87106 (505) 243-5319

Tucson Office, 1639 E. 1st Street
Tucson, AZ 85719 (520) 323-0547

THE SKY ISLAND ALLIANCE

is a coalition of conservationists and scientists dedicated to the preservation and restoration of native biological diversity in the sky islands of the southwestern United States and northwestern Mexico.

We conduct scientific research to provide a better basis for land management and disseminate this information through environmental education programs that foster an appreciation for the sky islands and biodiversity in general. We advocate for effective management through cooperation with land owners and managers at all levels, for reform of land management policies, and for the formation of national and international reserves to be integrated into a network throughout North America.



The Sky Islands provide habitat for the greatest diversity of plant and animal species in the United States!

WHAT ARE SKY ISLANDS?

They are the forested mountains that rise above a sea of desert and grassland like islands in the sky, providing habitat for the greatest diversity of plant and animal species in the United States. This is the meeting place for the Sonoran and Chihuahuan deserts and the Rocky Mountain and Sierra Madrean forests. Each mountain island has been isolated since the end of the last great Ice Age, fostering unique evolutionary changes. The entire region includes the sky islands, the Gila and Mogollon Highlands to the north, and part of the Sierra Madre to the south.

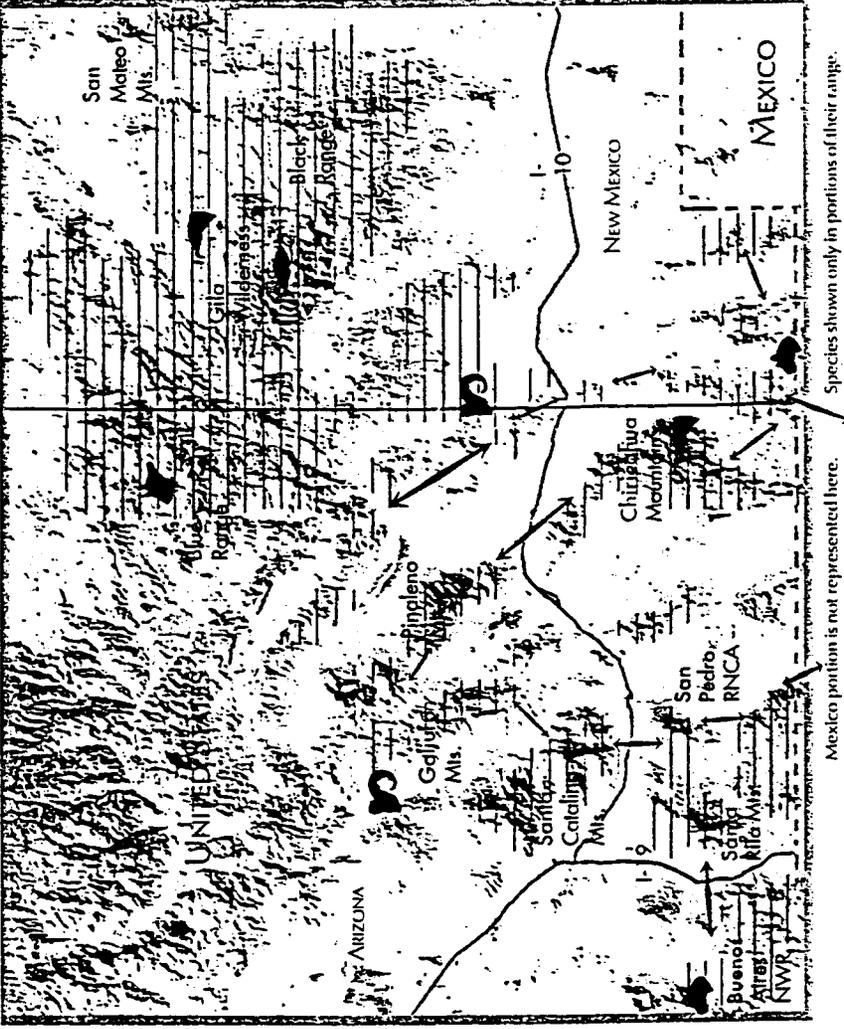


Over 2000 plant species are found in the United States portion of the Sky Islands.



The Sky Islands are among the most diverse ecosystems in North America

In the Coronado National Forest 56 plant species and 128 species of mammals, birds, fish, reptiles, and amphibians are considered potentially threatened or endangered, more than in any other forest of the Southwest U.S. (The Mexican portion of the sky islands contains many more species.)



Conceptual map of the Sky Island/Greater Gila Nature Reserve Network.

- bighorn
- jaguar
- wolf
- goshawk
- Gila trout
- core areas
- linkage between cores

RESERVE DESIGN

When species are no longer able to cross from one sky island to another because of human developments such as roads and subdivisions, they are in danger of being stranded on an "island" which is too small to support a healthy population. The Sky Island Alliance is designing a reserve system that will take into account both the human and non-human needs in the region in order to re-connect the sky islands and provide ways for animals to move throughout the region as they did historically.

Our reserve system has three components: cores, stewardship zones, and linkages. Cores include designated wilderness, roadless areas, and national parks where extractive



where extractive



uses are prohibited and ecological and evolutionary processes maintained. Stewardship zones will surround and enlarge the cores and permit sustainable extractive uses. Linkages connect the cores, allowing for genetic exchange to occur among wide ranging animals and plants while maintaining migratory pathways in times of environmental change.

Recovery areas are the fourth element not yet identified within the draft map of the region where closing roads, replanting streams, and other methods are employed to restore native biodiversity.



where extractive

L.G. and Barbara B, Wilson
6645 N. Waycross Rd
Tucson, AZ 85743

December 29, 1998

Pima County Administrator
Attn. Maeveen Behan
130 W. Congress St.
Tucson, AZ 85701

Dear Mr. Huckleberry:

As members of the Tucson Mountains Association and long time Pima County residents, we are strongly supportive of the Sonoran Desert Conservation Plan.

Many years ago, we met on Saturday mornings at Pima College with others interested in developing a Comprehensive Area Plan for Pima County and the Sonoran Desert. A few of our ideas were:

1. No building on mountainsides
2. Diminishing densities towards the mountains
3. Favor growth within the Tucson City limits

As it turned out our Saturday mornings were a waste of time as our desires were mainly ignored. The developers were in full control and our efforts to protect the desert were fruitless.

Your Sonoran Desert Conservation Plan has given us hope in reversing the past trend by trying to save what little is left of the Sonoran Desert. We wish you the best of luck in getting your plan adopted very quickly. Please make sure the plan is not "watered down" to render it useless.

Truly Yours

Barbara B. Wilson

L. JWL

VILLAGE OF CASAS ADOBES

P.O. Box 36704

Casas Adobes, AZ 85704

Martha Cramer, Mayor

C. H. Huckelberry,
County Administrator
Pima County Governmental Center
130 W. Congress, Tucson, AZ 85701

Dear Mr. Huckelberry;

In reviewing the draft report entitled the Sonoran Desert Conservation Plan, the absence of any reference to the Village of Casas Adobes is conspicuous.

On page 3, Table 3 (housing units by present jurisdiction), statistics are shown for Tucson, Oro valley, Marana, South Tucson, Sahuarita, and Unincorporated Pima County. No reference is made to Casas Adobes.

The last half of the draft is primarily figures (maps), some showing land areas that include the boundaries of Casas Adobes. No notation of Casas Adobes is made on these maps. In spite of that omission I was able to determine that the northwest corner of Casas Adobes is in an ironwood vegetation community, possible habitat for the cactus ferruginous pygmy owl.

As you know, on November 18, 1997, the Pima County Board of Supervisors ordered that Casas Adobes become an officially incorporated Arizona town. That order has never been rescinded, modified, changed or struck down.

For this report to be accurate, it is important that all official jurisdictions be recognized. Correcting this oversight will greatly improve this report.

Sincerely,



Martha Cramer
Mayor of Casas Adobes



Rincon Institute

650 E. Broadway Blvd.
Suite 203
Tucson, AZ 85710
Telephone (520) 290-0828
FAX (520) 290-0969
e-mail: soninst@azstarnet.com

December 30, 1998

Chuck Huckelberry
County Administrator
Pima County Governmental Center
130 West Congress
Tucson, AZ 85701

Dear Mr. Huckelberry:

Thank you for the opportunity to review the draft Sonoran Desert Conservation Plan (SDCP) issued by Pima County in October 1998. The Rincon Institute, with input from a team of biologists, cartographers and Rincon Valley residents, has analyzed the boundaries of the proposed mountain parks and riparian preserves in the Rincon Valley. We write to provide Pima County with recommendations regarding the boundaries of the proposed expansion of Colossal Cave Mountain Park (Colossal Cave).

The current draft of the SDCP proposes to expand Colossal Cave, connecting it with the Cienega Creek Natural Preserve on the southwest and Coronado National Forest's Rincon Mountain Wilderness on the northeast. In order to secure the long-term ecological health of Rincon Creek and lower Agua Verde Creek, which provides a critical connection between Colossal Cave and Cienega Creek Natural Preserve, the Rincon Institute is proposing that the boundaries of Colossal Cave be modified to include approximately 14,160 additional acres comprised of the large parcel of State Trust land on the northwest and the remainder of the Agua Verde Creek riparian corridor on the southeast. These recommended additions to Colossal Cave are described on the enclosed map and accompanying comment paper, which discusses the site-specific natural resource protection needs they will meet.

Adding these lands to Colossal Cave will preserve critical headwater tributaries of Rincon and Agua Verde Creeks; connect Colossal Cave with Rincon Creek and Saguaro National Park; and connect the Agua Verde Creek corridor with

the Rincon Mountain Wilderness. An even more important benefit of protecting these lands is that they are essential to providing an adequate long-term biological linkage between the Rincon and Santa Rita Mountains, the Empire-Cienega Resource Conservation Area, and other protected areas to the south.

In addition, during our analysis of Pima County's data sets describing the Rincon Valley, we found that a small portion of the Rincon Creek riparian corridor located immediately upstream from the Rincon Creek Restoration area and west of Camino Loma Alta is not designated as a "Biological Corridor/Link," as is the remaining upstream portion of the creek. This may simply be an unintended omission; however, we wish to ensure that this small but significant reach receives the Biological Corridor/Link designation in the County's databases and the SDCP. It is a critical link in the Rincon Valley, as it connects the primarily natural upstream reach of Rincon Creek, which flows west out of Saguaro National Park and the Rincon Mountain Wilderness, with the Rocking K Ranch reach that is slated for substantial restoration. This "missing link" is also described in the enclosed comment paper.

The Rincon Institute intends to further analyze additional important conservation areas in southeastern Pima County that are addressed in the SDCP. We plan to analyze the boundaries of the proposed Santa Rita Mountain Park, Davidson Canyon Natural Preserve, and Mescal Arroyo Riparian Corridor, as well as the expansion of the Cienega Creek Natural Preserve.

We would like to reiterate our strong conceptual support for the SDCP, and thank you again for the opportunity to provide input on this vital plan. Please call if you have any questions about the proposed additions or their justifications.

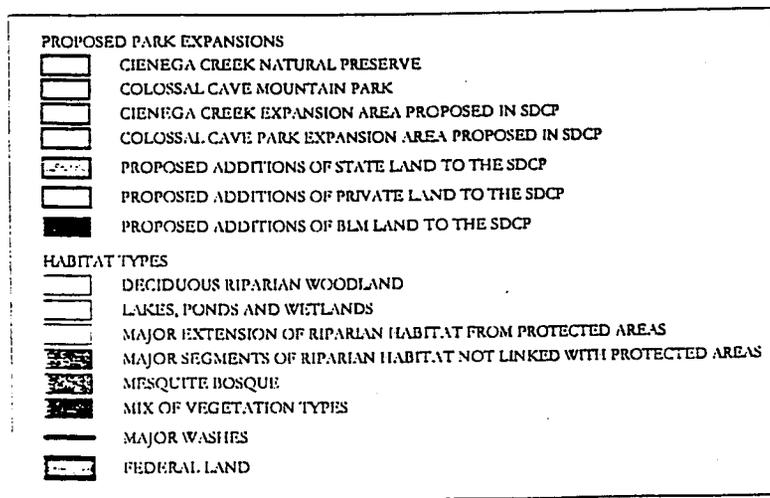
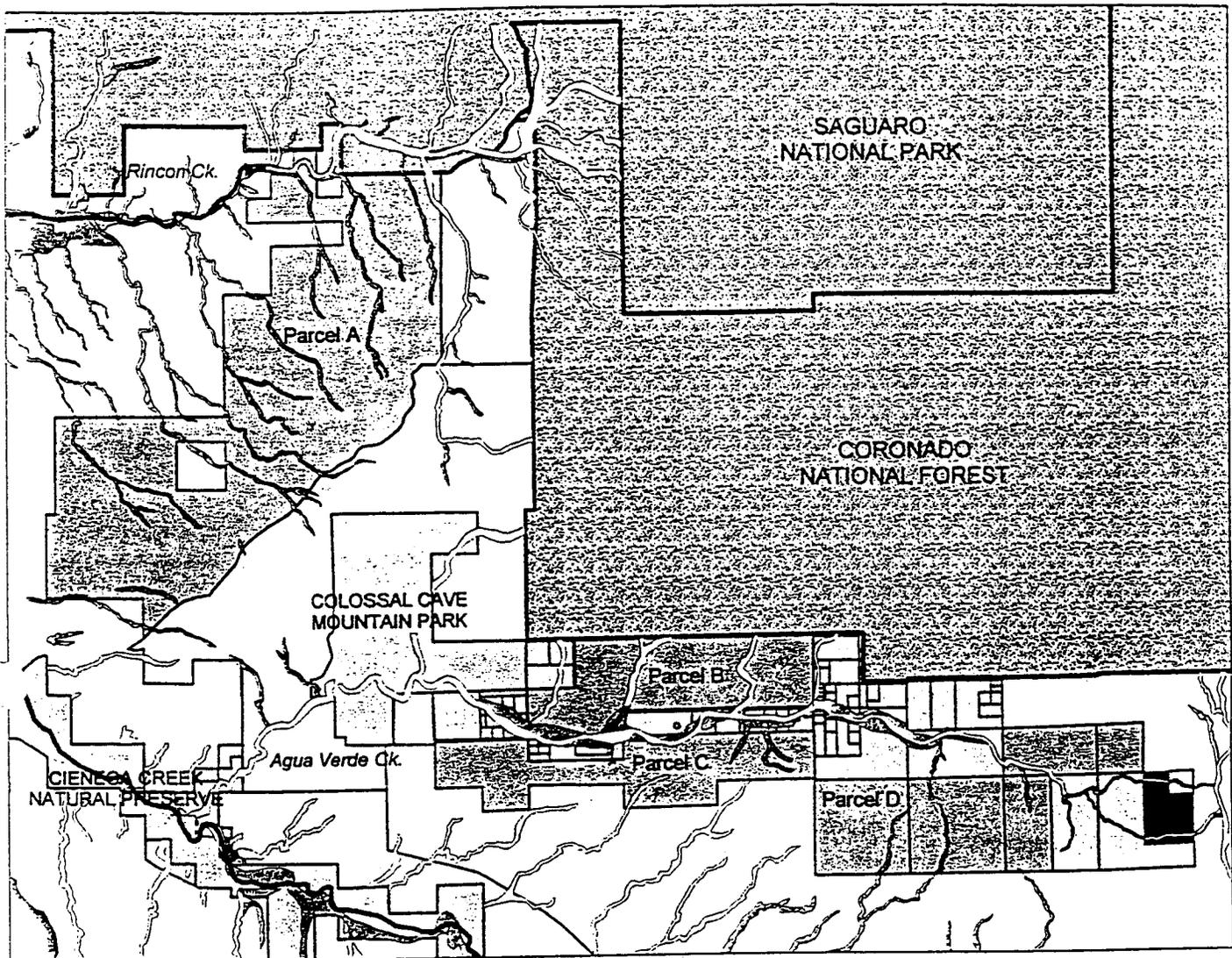
Sincerely,


Luther Propst
Executive Director
Rincon Institute

enclosures

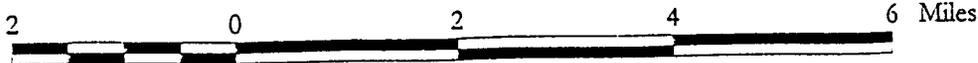
cc: Maeveen Behan, County Administrator's Office
Dan Felix, Parks and Recreation Director

Proposed Additions to the Sonoran Desert Conservation Plan, Colossal Cave Mountain Park Expansion Area



Projection UTM
Zone 12
Datum NAD83

Rincon Institute
Rapid Assessment Program
 Map prepared using data
 provided by the Pima County
 Department of Transportation (11.29.98),
 and the PCLIS CD version 4.0.
 Map prepared by John Mangiameli
 December 1998



**Proposed Additions to the
Sonoran Desert Conservation Plan,
Colossal Cave Mountain Park Expansion Area**

Prepared by the Rincon Institute

December 30, 1998

The Rincon Institute (RI) recommends that the boundaries of the Colossal Cave Mountain Park (CCMP) expansion area described in the draft Sonoran Desert Conservation Plan (SDCP) dated October 21, 1998, be modified to include approximately 14,200 additional acres. These additions will:

- connect CCMP with Saguaro National Park;
- preserve critical headwater tributaries of Rincon and Agua Verde Creeks;
- ensure the health of lower Agua Verde Creek (which connects CCMP to the Cienega Creek Natural Preserve) by protecting the upper two-thirds of the creek; and
- connect the Agua Verde Creek corridor with Coronado National Forest's Rincon Mountain Wilderness.

The proposed additions include approximately 10,840 acres of State Trust land, 3,160 acres of private land, and a 200-acre parcel of Bureau of Land Management (BLM) land. These lands are described as follows.

Proposed Additions of State Trust Land to Colossal Cave Mountain Park

The Rincon Institute proposes the addition of four parcels of State Trust land to CCMP. The first parcel is generally described as the approximately 5,990 acres of contiguous State land north and west of Pistol Hill Road, the northernmost portions of which adjoin the Saguaro National Park (SNP)

Expansion area (see Parcel A on attached map). Approximately 320 additional acres of this contiguous State parcel already lie within the boundaries of the SNP Expansion area. Modifying CCMP's boundaries to include this parcel will directly link CCMP with SNP in two locations, as well as permanently protect a segment of Rincon Creek located just downstream from the SNP boundary.

The second, third and fourth parcels are generally described as the 1,425-acre contiguous parcel of State land north of Agua Verde Creek (see Parcel B on attached map), the 1,344-acre contiguous parcel of State land south of Agua Verde Creek (see Parcel C on attached map), and the 2,080 acres of State land in T16N R18E comprised of Section 19, Section 20, W ½ Section 21, S ½ Section 16 and SW ¼ Section 15, through which Agua Verde Creek passes (see Parcel D on attached map).

Addition of these parcels to CCMP will protect a majority of the land directly adjacent to the upper two-thirds of Agua Verde Creek, as well as all of its tributaries, and will create a significant biological linkage between the creek and Coronado National Forest's Rincon Mountain Wilderness to the north. In addition, protecting the upper reaches of Agua Verde Creek will help ensure the health of the lower one third, which is already included in the SDCP as a vital connection between CCMP and Cienega Creek Natural Preserve (this is discussed further below, in the section on protecting riparian habitat).

Proposed Additions of Private Land to Colossal Cave Mountain Park

As illustrated on the attached map, proposed private land additions include all parcels within the area generally described as the approximately 3,160 acres in NW ¼ Section 16 T16N R17E, NE ¼ Section 16 T16N R17E, SW ¼ Section 10 T16N R17E, N ½ of S ½ Section 15 T16N R17E, S ½ of N ½ Section 14 T16N R17E, S ½ of N ½ Section 13 T16N R17E, SW ¼ Section 7 T16N R18E, Section 18 T16N R18E, Section 17 T16N R18E, E ½ Section 21 T16N R18E, and Section 22 T16N R18E excluding the 200 acres of Bureau of

Land Management land. Agua Verde Creek passes directly through most of these private parcels.

Proposed Addition of BLM Land to Colossal Cave Mountain Park

A 200-acre parcel of BLM land is located at the head of Agua Verde Creek in Section 22 T16N R18E. In order to simplify natural resource management of the Agua Verde Creek riparian corridor, the Rincon Institute proposes including this parcel within CCMP boundaries. RI anticipates that BLM will endorse this proposal.

Proposed Addition to the Rincon Creek Biological Corridor/Link

While reviewing the SDCP, RI found that a small segment (approximately ¼ mile long) of the Rincon Creek riparian corridor located immediately west of Camino Loma Alta, and immediately upstream from the Rincon Creek Restoration area within the Rocking K Ranch, is not designated in Pima County's data sets as a Biological Corridor/Link, as is the remaining upstream portion of the creek. This reach represents a critical biological link in the Rincon Valley, as it connects the primarily natural upstream reach of Rincon Creek, which flows out of Saguaro National Park and the Rincon Mountain Wilderness, with the Rocking K Ranch reach that is slated for substantial rehabilitation. Furthermore, on the west side of the Rocking K Ranch lies a healthy reach of Rincon Creek that is owned by the County (formerly part of Thunderhead Ranch).

RI therefore proposes designating as "Biological Corridor/Link" all or portions of the nine parcels along Rincon Creek that would link the eastern boundary of the Rocking K Ranch with the upstream reach that is considered a "Habitat, Biological and Ecological Corridor Conservation location" by Pima County. The nine parcels are labeled with the item name "Parcel" in the County's parcel layer on the PCLIS CD version 4.0. The parcel numbers are: 20573002J, 20573001B, 20586068A, 20586068B, 20586067A, 20586067B,

and portions of 20573002H, 20573002D, and 20573002G north of E Lazy R Ranch Road. This area totals approximately 80 acres. (Note: these parcels are not displayed on the attached map).

Comments

RI has a significant history and interest in the Rincon Valley, as we work to carry out our mission of working with Saguaro National Park and its neighbors to protect the natural resources of the Park and surrounding lands. We therefore make this proposal in the spirit of providing a more comprehensive approach to protecting Pima County's natural resources in the face of rapid population growth and land use changes, while enhancing the living environment of Rincon Valley residents. RI also recognizes that the proposed additions will contribute to a more diverse outdoor experience for Pima County residents who use Colossal Cave Mountain Park.

More specifically, RI makes this proposal to:

1. Protect headwater tributaries of Rincon and Agua Verde Creeks as well as Agua Verde Creek itself. These washes are labeled on the attached map as "major segments of riparian habitat not linked with protected areas."
2. Take a proactive approach to resource protection in the Rincon and Agua Verde Creek watersheds — protect these areas now to avoid problems associated with increasing urbanization, including:
 - a) landscape fragmentation and habitat destruction;
 - b) mortality of wild animals;
 - c) an increase in the domestic animal population; and
 - d) introduction of exotic species.
3. Provide landscape connectivity that makes more sense ecologically.
4. Provide larger refuges for species of special concern.
5. Include creosote-bursage plant communities in CCMP.

A discussion of these goals and how the proposed additions will further them follows.

Protect Riparian Habitat

The lower one-third of Agua Verde Creek connects CCMP with Cienega Creek, one of the few perennial streams remaining in Pima County. Although this critical biological linkage is included in the expansion of CCMP proposed in the October 21 draft of the SDCP, its ecological condition may become degraded if incompatible land uses occur on the creek's upper watershed. Adding the rest of Agua Verde Creek's main stem and its headwaters to CCMP will ensure that healthy riparian habitat linking Cienega Creek Natural Preserve, CCMP and the Rincon Mountain Wilderness is maintained over the long term.

Many washes that drain into both Rincon and Agua Verde Creeks have their headwaters in the State Trust lands that RI proposes as additions to the SDCP. The County has designated many of these washes as "major segments of riparian habitat not linked with protected areas." The benefits of protecting these areas by adding them to CCMP include preserving intact riparian plant and animal communities, and maintaining the natural drainage systems that transport stormwater to Rincon and Agua Verde Creeks.

Prevent Habitat Destruction and Landscape Fragmentation

Increasing urbanization adversely affects natural plant and animal communities (Soulé 1991, Grant et al. 1996, Knight et al. 1995). A natural mosaic of land cover has "soft" edges, or ecotones, as land cover changes gradually from one type to another. However, anthropogenic landscape change often results in "hard" edges. Land cover changes abruptly at road pavement, privacy walls, and backyard landscaping. Habitat destruction and landscape fragmentation result in smaller, more isolated patches of habitat surrounded by areas where species are rare or absent. Isolation impacts population, population cycles and density, probability of local extinction, and genetic variability.

Landscape fragmentation results not only from tracts of housing or commercial development but also from fences and roads. Although fences are a lesser-known problem than roads, they nonetheless contribute to decreased landscape connectivity (Knight et al. 1995). Travel routes blocked by fences may lead to isolation of populations, or inability to access food or other resources. Roads, even dirt roads, have a substantial impact on animals, especially small animals (Adams and Geis 1983, Andrews 1990). In addition to isolating populations, roads lead to direct mortality by automobiles or predators (Kline and Swann 1997, 1998). Larger roads, such as divided highways, are significant impediments to the movement of larger species including mountain lions (*Felis concolor*) and pronghorn antelope (*Antilocapra americana*), and are major sources of mortality for deer (*Odocoileus sp.*).

Increasing urbanization also means an increase in the number, and therefore impact, of domestic animals, chiefly cats and dogs. Free roaming dogs harass large mammals such as deer and javelina. Harassment may lead to increased levels of stress or abandonment of otherwise suitable habitat. Cats, on the other hand, kill substantial numbers of wildlife including birds, small mammals, and reptiles. Goldsmith et al. (1991) estimate that one cat can kill between 52 and 108 animals per year.

Urbanization also leads to introduction of exotic plant species into natural communities. Introduced species include Lehmann lovegrass (*Eragrostis lehmanniana*), Bermuda grass (*Cynodon dactylon*), salt cedar (*Tamarix ramosissima*), and many ornamental landscaping plants. These species are often invasive and out-compete native plants. A change in vegetation composition and structure may lead to decreased richness of native species and consequent loss of habitat for native animals.

Other threats from urbanization include poaching, illegal collection of plants and animals, loss of buffer zones, and exposure to pesticides, herbicides, and other household toxins (Janzen 1986, Kushlan 1987,

Stottlemyer 1987, Shafer 1990, Barendregt et al. 1995, and Johnson and Carothers 1987).

The Rincon Valley is still a primarily undeveloped, relatively intact and natural area at this time. It is bordered by large protected areas on the north and east, and Colossal Cave Mountain Park and Cienega Creek Natural Preserve on the south. Upper Rincon Creek supports native riparian woodland and mesquite bosque, while a significant portion of lower Rincon Creek will be restored in the near future. The Agua Verde Creek watershed, which lies among Rincon Peak's southern foothills, south of the Coronado National Forest boundary, is even less urbanized than the Rincon Valley. Adding the lands described above to the SDCP is a proactive approach to protecting these valuable natural resources. Such an approach will help prevent the problems associated with habitat loss and fragmentation from occurring in this special area, and avoid the high costs of restoring resources after they've been degraded.

Provide Landscape Connectivity

Landscape connectivity (also known as biological linkages or corridors) is an important landscape feature for wildlife (Beier 1993, 1995; Fahrig 1985; Green 1994; Hudson 1991; MacClintock et al. 1997; Noss 1987, 1994; Noss et al. 1998; Rosenberg et al. 1997; Simberloff et al. 1992). Connectivity is important for several reasons. Animals must move to avoid inbreeding, spread genetic material to other populations to maintain genetic variability, and locate necessary resources or habitats in heterogeneous landscapes (Hansson 1991). Adequate biological linkages must cut across landscape gradients. Dispersing animals move in a direction that continues to provide correct cues (e.g., vegetation composition or structure, cover, or soil type). They do not make 90-degree turns in order to follow a human designed "corridor."

The lands that RI is proposing be added to the SDCP provide a diverse range of vegetation, hydrographic, and physiographic landscape features.

These proposed additions therefore increase the likelihood animals will make use of protected lands to traverse the landscape. An even more important benefit of including these lands is that they are critical to providing an adequate long-term biological linkage between the Rincon and Santa Rita Mountains, the Empire-Cienega Resource Conservation Area, and other protected areas to the south.

Provide Larger Refuges

The reserve design literature is rich with discussion regarding the size and shape of biological reserves (e.g., Soulé 1991, Simberloff et al. 1992, Shafer 1990). The term SLOSS – single large or several small – describes the dichotomy. In general, one large reserve is better than several small ones; connected is better than isolated; and a regular shape (e.g., a circle or square) is better than an irregular shape (e.g., long and narrow). A larger reserve increases the probability of protecting a greater share of local populations and areas of habitat, while reserves that target a specific management objective work best.

The additions to the SDCP proposed by RI expand the boundaries of CCMP to connect with those of two large, contiguous protected areas. They also encompass a significant amount of habitat that accommodates a host of species found on the United States Forest Service's list of sensitive species, including the Lowland leopard frog (*Rana yavapaiensis*), Colorado River toad (*Bufo alvarius*), Gila monster (*Heloderma suspectum*) and Desert tortoise (*Gopherus agassizii*).

Include Creosote-Bursage Plant Communities in CCMP

The Tucson Basin was once covered extensively by creosote-bursage plant communities. Although creosote is one of the Sonoran Desert's most characteristic plants (it is largely responsible for the way the desert smells after it rains), people for the most part are not particularly concerned when creosote

flats are removed to make way for development. This is most likely due to the unspectacular appearance of these communities and the fact that they appear to be very common. Nevertheless, these two shrubs fill important ecological roles. For example, creosote is an efficient soil protector and stabilizer, while bursage acts as a "nurse" plant that protects the young plants of a variety of cactus, tree and shrub species. In addition, creosote has been used for centuries to treat a variety of health problems; it has been found to contain chemical compounds that have antifungal, antibacterial and analgesic properties (Nabhan 1985).

The vegetative cover of a significant portion of the State Trust lands that RI is proposing be included in CCMP is creosote-bursage. Although it is not possible to justify inclusion of this plant community in CCMP based on something dramatic like threat of extinction, the fact that these lands contain extensive stands of healthy, undisturbed native vegetation offers us the opportunity to ensure that this distinctive plant community does not become a rare commodity in eastern Pima County as Tucson continues to expand.

Literature Cited

- Adams, L.W. and A.D. Geis. 1983. Effects of roads on small mammals. *Journal of Applied Ecology* 20:403-415.
- Andrews, A. 1990. Fragmentation of habitat by roads and utility corridors: a review. *Australian Zoologist* 26(3&4):130-141.
- Barendregt, A., M.J. Wassen and P.P. Schot. 1995. Hydrological systems beyond a nature reserve: the major problem in wetland and conservation of Naardermeer (the Netherlands). *Biological Conservation* 72:393-405.

Beier, Paul. 1993. Determining minimum habitat areas and habitat corridors for cougars. *Conservation Biology* 7(1):94-108.

Fahrig, L. and G. Merriam. 1985. Habitat patch connectivity and population survival. *Ecology* 66(6):1762-1768.

Grant, J., et al. 1996. A framework for planning sustainable residential landscapes. *Journal of the American Planning Association* 62(3):331-344.

Green, David G. 1994. Connectivity and complexity in landscapes and ecosystems. *Pacific Conservation Biology*, in press.

Goldsmith, A., William W. Shaw, and John Schelhas. 1991. The impacts of domestic dogs and cats on the wildlife of Saguaro National Monument. Final Report. U.S. Department of Interior, National Park Service.

Hansson, Lennart. 1991. Dispersal and connectivity in metapopulations. *Biological Journal of the Linnean Society* 42:89-103.

Hudson, Wendy E. 1991. *Landscape Linkages and Biodiversity*. Island Press, Washington D. C.

Johnson, R.R., and S.W. Carothers. 1987. External threats: the dilemma of resource management on the Colorado River in Grand Canyon National Park, USA. *Environmental Management* 11:99-107.

Janzen, D.H. 1986. The external threat. Pages 286-303 in M.E. Soule, ed. *Conservation Biology: The Science of Scarcity and Diversity*. Sinauer Assoc., Sunderland, MA.

- Kline, N.C., and D.E. Swann. 1997. Results of roadkill surveys in Saguaro National Park. Pages 156-160 in Proceedings of the 9th Conference on Research and Resource Management in Parks and on Public Lands: the 1997 GWS Biennial Conference.
- Kline, N.C., and D.E. Swann. 1998. Quantifying wildlife road mortality in Saguaro National Park. Pages 23-27 in ICOWET, February 9-12, 1998.
- Knight, R.L., G.N. Wallace, and W.E. Riebsame. 1995. Ranching the view: subdivisions versus agriculture. *Conservation Biology* 9(2):459-461.
- Kushlan, J.A. 1987. External threats and internal management: the hydrological regulation of the Everglades, Florida, USA. *Environmental Management* 11:109-119.
- MacClintock, Lucy, Robert F. Whitcomb, and Bruce L. Whitcomb. 1977. Evidence for the value of corridors and minimization of isolation in preservation of biotic diversity. *American Birds* 31(1):6-12.
- Nabhan, Gary Paul. 1985. *Gathering the Desert*. University of Arizona Press, Tucson.
- Noss, Reed, Paul Beier, and William Shaw. 1998. *Evaluation of the Coal Canyon biological corridor*. Oregon State University.
- Noss, Reed F. 1987. Corridors in real landscapes: a reply to Simberloff and Cox. *Conservation Biology* 1(2):159-164.
- Noss, Reed F. and Allen Y. Cooperrider. 1994. *Saving Nature's Legacy*. Island Press. Washington, DC.

Rosenberg, Daniel K, Barry R Noon, and E. Charles Meslow. 1997. Ecological role of linear conservation areas for maintaining biological diversity.

Shafer, C.L. 1990. Nature reserves: island theory and conservation practice. Smithsonian Inst. Press, Washington, D.C.

Schwartz, Mark W. 1997. Conservation in Highly Fragmented Landscapes. Chapman & Hall. New York.

Simberloff, Daniel, James A. Farr, James Cox, and David W. Mehlman. 1992. Movement corridors: conservation bargains or poor investments? Conservation Biology 6(4):493-504.

Soulé, M.E. 1991. Theory and strategy. Pp. 91-104 in W.E. Hudson, Landscape Linkages and Biodiversity. Island Press. Washington D. C.

Stottlemyer, R. 1987. Evaluation of anthropogenic atmospheric inputs on US national park ecosystems. Environmental Management 11:91-97.

January 5, 1999

Janet K. Austrey

To: whoever this may concern,

Thankyou for Sending Maveen Behan and Linda Melroy here on McGee Ranch in the Sierrita Mountain Range to discuss the Sonoran Desert Conservation Plan or "Ideas" with us. The time they took to let us understand what is going on is greatly appreciated. If your goal is indeed the same as ours, if your goal will indeed have the same outcome as we would like then great. I'm sure we could try to work something out. What we basically want is to be left alone, to continue being good stewards of this land, we want to continue doing what we have been doing. We do not plan to develop this land and/or become a Wildcat Subdivision. We do plan to continue our ranching.

I hope you understand that we are leary. We do not feel that the way we first found out about this Conservation Plan "idea" was fair, because no one came to tell us first. We had to hear this from reporters. We are truly grateful that Maveen and Linda came here to try to rectify this, but you have to understand our lack of trust. If you would like us to trust you then you have to prove yourselves trustworthy. Let us know all your future plans or ideas about this Sonoran Desert Conservation Plan.

I do not think this place should be called a park. After it was printed in the paper about the plans for this place to be a park and directions on how to get here were printed, the next Saturday morning I woke up and there was a R.V. in my front yard. Not only did we not understand this plan about this place becoming a park, but the rest of the public apparently got the wrong idea. Put yourself in this position and imagine having strangers camping in your yard. Kind of upsetting isn't it. We do not want people to think they have access to our front and back yards. Would you? Call us Sierrita Mountain historical and ranching conservation or even the place where happy little animals, plants and the endangered ranchers live, but please do not call us a park.

Thankyou for your time,

Janette K. Austrey



Historical Commission

January 4, 1999

Mr. C. H. Huckleberry
County Administrator
130 West Congress
Tucson, AZ 85701-1317

Dear Mr. Huckleberry:

Per the request of Ms. Linda Mayro, Pima County Cultural Resources Manager, I have reviewed the county's Sonoran Desert Conservation Plan. The preparers of the document are to be commended for pinpointing the six elements that comprehensively address the sensitive conservation issues in the Tucson Basin. I understand, however, that the plan is still in the conceptual stage and that much remains to be done regarding development of policy statements, boundaries, and an implementation strategy.

As you know, the Tucson-Pima County Historical Commission serves in an advisory role to the Mayor and Council and to the Pima County Board of Supervisors regarding historic preservation issues in the city and county. We support the county's efforts and would very much like to contribute our expertise to both the steering committee and technical advisory committee for the Sonoran Desert Conservation Plan.

We look forward to hearing from you regarding our interest in the plan.

Sincerely,

Teresita Majewski
Teresita Majewski, Chair
Tucson-Pima County Historical Commission

cc: Pima County Board of Supervisors
Linda Mayro, Pima County Cultural Resources Manager
Maeveen Behan, County Administrator's Office
Mayor and Council
City Manager
City Clerk
Commission Members



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Governor Jane Dee Hull

Russell F. Rhoades, Director

January 4, 1999

Mr. Charles H. Huckelberry
County Administrator
Pima County Administration Building
130 West Congress Street
Tucson AZ 85701

Re: Draft Sonoran Desert Conservation Plan

Dear Mr. Huckelberry:

Please accept this letter as an expression of our Department's interest in assisting the County in the development and execution of its regional conservation planning processes. We have reviewed the pertinent Board of Supervisors Memoranda (dated December 1 and 3, 1998), as well as the published plan. Of particular interest to ADEQ are the plan elements which pertain to riparian restoration and ecology.

One of the senior members of my staff, Lin Lawson, is an acclaimed riparian biologist, and we would be willing to make him available for membership on the Riparian Advisory Team. A copy of Mr. Lawson's resume and a brief biographical sketch from an ADEQ publication are attached for your information. He is in charge of our Surface Water Monitoring Team and has recently authored our Department's 100-page "Stream Ecosystem Monitoring Procedures Manual."

In addition to offering Mr. Lawson's assistance and expertise, I also would like to express my own interest in supporting the County's planning process by volunteering to serve on the Steering Committee as an "Arizona State Departments, as appropriate" representative. My resume is also attached for your and the Board's consideration.

We certainly commend the County for its commitment in engaging the important issues related to desert conservation. If Mr. Lawson, I, or any other ADEQ employee would be of benefit to the County's planning process, please don't hesitate to call us.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Matthewson".

Charles H. Matthewson
Southern Regional Director

Employee Spotlight

Lin Lawson — Fluvial Hydrobiologist Extraordinaire

By Linda Huser, Assistant Fluvial Hydrobiologist

Lin Lawson is one of the very few who gets paid for what he loves to do. No, he's not a golf pro. But he thinks his is a slightly better job. Lin works out of our Southern Regional Office as a fluvial hydrobiologist under the alias of environmental program specialist. He has worked for ADEQ for the past nine years and remained by and large in the same unit with the same responsibilities for the surface water of Arizona. Frequent field trips to sample the rivers and streams of our fair state allow him to revel in the great outdoors when most of us are trapped in the office. And his unique talent for identifying macroinvertebrates* and other aquatic life can entertain and enlighten even managers. If you doubt his enthusiasm for his work, just take a look at his name plate on his cube which carries his philosophy: "Any field day is better than any cubicle day."

He wasn't always so content in his career choice, however. Believe it or not, Lin originally graduated from Brigham Young University (BYU) with a bachelor's degree in Design Engineering. After working three years at Pratt & Whitney Aircraft Corporation in Connecticut designing parts for jet engines, Lin had enough of engineering and decided to pursue his childhood infatuation of streams and rivers. Lin was born in Concord, Massachusetts and spent all of his childhood in Massachusetts enjoying the streams and wildlife of that area. So he went back to BYU and got his master's in Botany and Zoology. He also picked up another asset while he was there. He found his wife, Didi.

After that, Lin got a job in Charlotte, North Carolina and worked for five years at the Duke Power Company Environmental Lab as a Senior Environmental Biologist monitoring phytoplankton. A family emergency required their small family to move across the ocean to Stuttgart,

Germany for the next eight years. In Germany, Lin was unable to pursue his career in biology, but he secured a job with the U.S. military. After they returned to the states, they decided they wanted to leave the cold and rainy weather behind, so Arizona was the ideal choice to put down roots. Lin and his family have now lived in Tucson for the last 11 years and have raised two sons, Bjorn and Pehr, and a daughter, Pirijo, who are all in college now.

Lin has made significant contributions to ADEQ starting with completing the Water Quality Standards for most of the designated uses of the state's streams. He was assigned this project right after he was hired. Lin commuted to Phoenix for a year and a half before being transferred to the Southern Regional Office in Tucson, where he helped in the initiation and training of the first volunteer monitoring group sponsored by ADEQ. The Friends of Santa Cruz River have been monitoring since 1992 and continue to be a valuable resource for the agency. Lin was instrumental in developing the Stream Ecosystem Monitoring program for measuring the health and stability of our streams that is now in its second year of operation. His only other goals, besides working to make ADEQ a pacesetter in the

protection of our natural resources, is to break a score of 100 in golf (a hobby he began eight months ago) and to catch a six-pound bass.

Lin is currently finishing his Ph.D. from the University of Arizona in Fisheries and Wildlife Science to be completed by December of this year. "Dr." Lawson will then continue to use his expertise to further ADEQ's efforts in improving the streams of Arizona.

"Lin is a biologist, specializing in riparian ecology, in our Surface Water Monitoring Unit. He knows more about Arizona rivers and streams (and all the critters resident therein) than any other mere mortal."

**— Matt Matthewson,
Manager, Southern
Regional Office**

* bottom-dwelling aquatic animals without backbones large enough to be seen with the naked eye that include the damselfly, caddisfly, and water boatman.

RESUME

Lin Lawson
Aquatic Biologist

WORK EXPERIENCE:

Arizona Department of Environmental Quality (Feb. 1988 to Present). Environmental Program Specialist (1 yr. - present position), Hydrologist III (S/D 2 yrs.) and EHS II (5 yrs.):

- Eight years experience with surface water monitoring programs, three years supervisory experience and 8 years applied statistical analyses.
- Computer skills: Word Processing (WordPerfect and Microsoft Word), Spreadsheets (Paradox, Lotus 1-2-3, and Quattro Pro), statistical programs (Systat, SAS 6.1, and SPSS), Multivariate analyses (TWINSPAN, CANOCO, DECORANA, and Neural Networks), Utilities (Norton Commander and MS-DOS 6.22), Windows 3.1, and assorted other technical software.
- Technical/administrative leader for Fixed Station Network Monitoring Program (FSN), Intensive Survey Program, and Stream Ecosystem Monitoring Program (SEM).
- Wrote a significant portion of the current Water Quality Standards found in Arizona Administrative Code Title 18, Chapter 11.
- Designed the new Stream Ecosystem Surface Water Monitoring Program.
- Prepare annually the contractual agreement with the United States Geological Survey for surface water monitoring as part of the FSN Monitoring Program.
- Designed and managed the only successful volunteer surface water monitoring project supported by ADEQ.
- Experienced in surface water hydrology, math/statistics, inorganic chemistry, biology (specifically riparian biology, botany, microbiology, algology, fisheries biology, mycology, entomology, zoology, limnology), aquatic and stream ecology, fisheries management, water quality management, regulatory processes and programs of Arizona, management leadership and delegation, incidental hazardous materials handling, laboratory procedures, general chemistry, watershed management, research and library skills.

Duke Power Environmental Laboratory, Huntersville, North Carolina (June 1974 - April 1979). Senior Environmental Biologist. \

- Five years of supervisory experience.
- Designed and conducted environmental studies for rivers and lakes.
- Prepared and edited technical reports, conducted statistical analyses.
- Expert witness for Duke Power Company.
- Wrote environmental impact statements.
- Had oversight of data for compliance with state and federal water quality regulations.
- Collected, processed, and evaluated biological samples.
- Project leader for three major environmental projects.

EDUCATION:

Ph.D (in progress) University of Arizona - Tucson, Arizona, Fisheries and Wildlife Management (emphasis on stream ecology)

M.S. Brigham Young University, Provo, Utah, 1974, Botany and Zoology

B.S. Brigham Young University, Provo, Utah, 1967, Design Engineering Technology

SPECIAL TRAINING:

Wilderness First Aid Training, 1997

Applied Fluvial Geomorphology, 1997

Certified Public Manager, Foundation Level, Series I and II, 1996

OSHA 40-hour training, 1991, and 8-hour Refreshers, 1992 - 1997

Design of Water Quality Monitoring Networks, Colorado State University, 1994

National Resource Planning - Advanced Planning Process and Report Preparation, 1994

Water Quality Standards Workshop, EPA Region 9, Oakland, Ca., 1990

PROFESSIONAL AFFILIATION:

Arizona Hydrological Association

North American Benthological Society

AWARDS AND RECOGNITION:

Team of the Year Water Quality division, 1995
Employee of the Quarter Water Quality Division, 1994
Regular Guest Lecturer at University of Arizona for Limnology and Wildland Water Quality Courses, in the Renewable Natural Resources Department
Selected to participate in a KUAT Television production of The Desert Speaks featuring volunteer stream monitoring, 1994
Numerous letters of appreciation from federal and State agencies, ADEQ management, University of Arizona, and the general public

PUBLICATIONS:

Williams, R.W., L. Lawson, and M. Longworth. 1996. Christopher Creek Intensive Survey, Phase II. Arizona Department of Environmental Quality, Phoenix, Arizona.

Lawson, L., 1994. Upper Santa Cruz River Intensive Survey: A Volunteer Driven Study of the Water Quality and Biology of an Effluent Dominated Desert Grassland Stream in Southeast Arizona, Arizona Department of Environmental Quality, Phoenix, Az.

Lawson, L.L. and D. Buetow. 1979. Periphyton and Phytoplankton. In, An Environmental Study of the Broad River and Ninety-Nine Islands Impoundment in the Vicinity of the Proposed Cherokee Nuclear Station. Duke Power Co., Charlotte, NC.

Lawson, L.L., J.E. Derwort and J.E. Hogan. 1979. Periphyton and Phytoplankton. In, An Environmental Study of the Yadkin River, N.C., in the Vicinity of the Proposed Perkins Nuclear Station. Duke Power Co., Charlotte, NC.

Lawson, L.L. 1975. Algae. In, Project 81, Perkins Nuclear Station Environmental Report. Duke Power Co., Charlotte, NC.

Lawson, L.L. and S.R. Rushforth. 1975. The Diatom Flora of the Provo River, Utah, USA. *Bibliotheca Phycologica* 17.

Lawson, L.L. 1973. Algae. In, A survey of the Biota of the Bonneville Unit of the Central Utah Project, Brigham Young University, Provo, UT.

CHARLES H. (MATT) MATTHEWSON

**SOUTHERN REGIONAL MANAGER
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Responsibilities (incumbent since March 1997): Manages the Department's Southern Regional Office in Tucson, with a current staff of 30, focusing on the environmental regulation of drinking and waste water systems, the environmental regulation of air emission sources, the advancement of environmental programs along both sides of the Arizona/Sonora border, the investigation and remediation of state and federal superfund sites, the protection of the state's ground and surface waters, and the deployment of environmental emergency response staff. Coordinates and manages agency activities for Department stakeholders in Pima, Yuma, Cochise, Santa Cruz, Graham, and Greenlee Counties. Advocates for regional needs and interests in the development of agency plans, programs, positions, and policies.

Education: 1973--Juris Doctor from the University of Arizona College of Law
1970--Bachelor of Arts (cum laude/psychology) from Kenyon College (Ohio)

Experience: a 24-year career practicing, and directing others in the practice of, military law including administrative law, international relations, environmental protection, fiscal law, insurance and tort claims, criminal prosecution, medical law, occupational safety and health, legal aid, federal procurement, labor relations, and government ethics.

1985-1997 Supervisory legal counsel for a series of five progressively larger or higher level Air Force organizations in New York, Germany, Texas, New Mexico and Arizona, culminating with retirement in the grade of colonel and with the award of the Legion of Merit as the Staff Judge Advocate of 12th Air Force at Davis-Monthan AFB in Tucson.

1973-1985 Staff legal counsel for a series of three Air Force organizations in Colorado, England, and Texas.

Affiliations: Tucson Regional Water Council (board of directors), Pima Association of Governments (environmental planning advisory committee), Arizona Water Pollution Control Association, Arizona Hydrological Society, Southern Arizona Environmental Management Society, Arizona Bar Association, Colorado Bar Association, Federal Bar Association, D-M Federal Credit Union (loan review committee), Wright Flight (board of directors), and Air Force Association.

Personal: Married since 1975 to Edie Matthewson, a Realtor with Long Realty Company, Inc., with three children (Andrea, 20; James, 17; and Michael, 12)



ARIZONA-SONORA
DESERT
MUSEUM

January 4, 1999

Mr. C. H. Huckelberry
County Administrator
Pima County
Pima County Governmental Center
130 W. Congress
Tucson, Arizona 85701-1317

Dear Chuck:

Maeveen Bechan gave us an excellent overview presentation of your Sonoran Desert Conservation Plan. She indicated that it would be possible for me to be on the Steering Committee for this, and I am writing to inquire if indeed this is possible. If so, I would very much like to participate in this way or, if that is not appropriate, in some other fashion.

Best wishes for the New Year.

Best regards,

Richard H. Daley
Executive Director

RHD:sl

Post Office Box 85009
Tucson, Arizona 85754
January 4, 1999

Attn: Mr. Huckleberry

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association. I support the Sonoran Desert Conservation Plan to the extent that I would be happy to volunteer some of my time to some aspect of the work to be done.

This is a rare opportunity to preserve some of our desert habitat and I strongly urge the powers that be to grasp this opportunity to resist the efforts to dilute and weaken the plan, and push for a consensus to put the plan into action.

Sincerely yours,



John E. Martin
5140 West Salerno Drive
Tucson, Arizona 85745

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: *We must protect our
lands that have environmental
and historical importance.*

My specific concerns regarding the Plan are:

Adopt as written.

Sincerely,

 (Signature)

Jill Rich (Printed Name)

7735 N. Sandra De Anza (Address)

Tucson, AZ 85718

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: *We believe this plan will greatly enhance the future livability and desirability of Tucson.*

My specific concerns regarding the Plan are: *Delays in funding it will increase the cost of acquisitions.*

Sincerely,

Don Arkin

Sharon Emley

(Signature)



Mr Don I Arkin
730 N La Cholla Blvd
Tucson, AZ 85745

Sharon Emley

(Printed Name)

(Address)

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: The main concern is that this process doesn't get co-opted by pro-development forces. Mr. Huckleberry, you have yet to prove to us that you favor responsible, state-of-the-art planning. This is a good opportunity to do so.

My specific concerns regarding the Plan are:

1. it should not act as yet another subsidy to ranchers.
2. that it excludes HCP areas from critical habitat for pygmy owls - I hope that this doesn't become permanent.
3. that it includes reasonable restrictions on development including:

Sincerely, Susan Zakin ^{increased nature, plant protection, hillside} (Signature)

Susan Zakin (Printed Name)

6250 W. Sweetwater Rd. (Address)

Tucson AZ 85745

17 Sand buffer zone protection. Recent reforms don't go far enough.

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: In contrast to forested lands of the Eastern U.S., vegetation in deserts is too short and sparse to conceal urban sprawl. So without tighter regulation, growth in its present form is sure to destroy the aesthetic character of our region.

~~My specific concerns regarding the Plan are:~~

Protecting sensitive habitats and creating more parks in buffer zones will not only help wildlife, it just might save the beauty of our desert community.

Sincerely,

Thomas A. Wiewandt

(Signature)

THOMAS A. WIEWANDT

(Printed Name)

5757 W. Sweetwater Dr.

(Address)

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments:

It is imperative we have
greater rules + regulations for
new homes - to save the
Sonoran Desert!

My specific concerns regarding the Plan are:

1. No spraying in targeted areas.
2. Preserve open space
3. Higher standards and conditions
for building

Sincerely,

Mildred T. Kiser (Signature)

MILDRED T. KISER (Printed Name)

3030N CAMINO DE DESERTE (Address)

TUCSON AZ 85745

12/29/98

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: I was born in Tucson & grew up in the Tucson Mts. I love our desert & our unique environment. My children have also grown up in the Tucson Mts. We are watching it vanish, where will our animals live, will they continue to populate. Please save our desert for our future children. It is truly magical to live here.
My specific concerns regarding the Plan are:

Please secure the desert while we still have some. Our Valley is so special. It should never become California. Please save as much as we can. Our family has lived here 5 (five) generations.
Sincerely,

BZ Manfredonia (Signature)

Beverly L. MANFREDONIA (Printed Name)

7605 W. INA Rd Tucson AZ (Address)

85743

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments:

THANK YOU for supporting
this effort to preserve our
precious desert. We have such
a beautiful + unique (ie saguaros)
flora and fauna that deserves our help!
My specific concerns regarding the Plan are:

- ① Let's get the Santa Cruz running
again and preserve the other
riparian habitats (Cienega Creek
and Sangre Verde Wash).

Sincerely,

Jill Littrell

(Signature)

Jill Littrell

(Printed Name)

5811 W. El Camino del Cerro

(Address)

85745

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments:

Excellent!!

My specific concerns regarding the Plan are:

Sincerely,

Jean B. Moore

(Signature)

Jean B. Moore

(Printed Name)

5200 W. Lazy C Dr. 85745

(Address)

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments:

Am a scientist but will a horse
and bought a car here (plus lots of
generators etc!)

My specific concerns regarding the Plan are:

Love it. Save more of the best for
the future generations. They will come.

Sincerely,

Ann P. Duxch (Signature)

Ann P. Duxch (Printed Name)

1920 E. T. Hwy 7 P. 85712 (Address)

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments: *Congratulations on your
desert conservation plan. With the
present conditions I fear for the
loss of our water supply, our
air and also our unique history.*

My specific concerns regarding the Plan are:

Sincerely,

Catherine Penny (Signature)

CATHERINE PENNY (Printed Name)

5441 W. PLACITA DE LA PROMESA (Address)

TUCSON, AZ 85745

Post Office Box 85009
Tucson, Arizona 85754
January 5, 1999

Attn: Mr. Huckleberry

Dear Mr. Huckleberry:

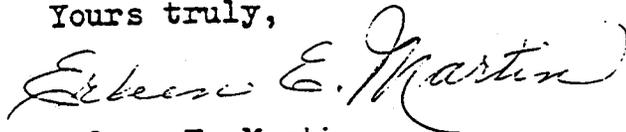
I am a member of the Tucson Mountains Association. I support the Sonoran Desert Conservation Plan.

This is an excellent concept that needed to be put into effect long ago. I commend all who are responsible for bringing this plan to pass.

We desperately need to preserve what is left of our beautiful and precious desert!

Thank you.

Yours truly,



Erleen E. Martin
5140 West Salerno Drive
Tucson, Arizona 85745

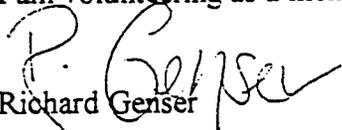
Richard E. Genser

5 January, 1999

Dear Mr. Huckelberry,

I would like to join the steering committee for the Sonoran Desert Conservation Plan.

I am volunteering as a member of the business community.


Richard Genser

Sierrita Mountain Coalition



HC 70 Box 4526
Sahuarita, AZ. 85629

MR. C. H. HUCKLEBERRY
COUNTY ADMINISTRATOR
130 W CONGRESS ST, 11TH FLOOR
TUCSON, AZ 85701

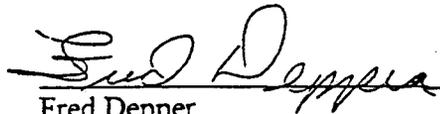
Dear Mr. Huckleberry:

The people who will be affected by the Sonoran Desert Conservation Plans "Sierrita Mountain Park" are forming a coalition. The purposes of this coalition are to keep members of the coalition informed of all events taking place as this plan takes shape and to voice unanimous support or opposition to these actions.

I have been elected as the chairperson for this coalition. The coalition has authorized me to request that you appoint a member from this coalition to your Steering Committee for the Sonoran Desert Conservation Plan. The person we have chosen is Richard D. Harris. I have enclosed a brief resume of his qualifications.

I hope that you honor this request for we are attempting to work with you for the good of all concerned.

Sincerely,


Fred Depper
Chairperson

Enclosure

Phone: (520) 648-0641

RESUME

RICHARD D. HARRIS
HC YOU BOX 4623
SAHUARITA, AZ 85629
(520) 625-7866

Personal Data:

Age - 64
Date of Birth - 1/24/34
Married - wife LaVerne
4 children (all married)
retired

Employment History:

1955-1957 Lieutenant U.S. Army, Fort Knox, Kentucky
1957-1959 Surveyor, Lenon Eng. Patagonia, Arizona
1959-1960 Deputy County Assessor - Santa Cruz County, Nogales, Arizona
1961-1968 Elected County Assessor - Santa Cruz County, Nogales, Arizona
1968-1973 Agriculture Agent, University of Arizona - Navajo County
Assigned to White Mountain Apache Reservation
1973-1997 County Extension Director - Santa Cruz County, University of
Arizona

Education:

1951 - High School Diploma - Amphitheater High School - Tucson, Arizona
1955 - University of Arizona Degree - Range Ecology
1968-1997 - 15 Hours Graduate Credit - University of Arizona

Work Experience:

- *Range Conservationist Officer - Fort Knox, Kentucky Reseeded many areas on fort torn up by tanks.
- *Surveyed mineral claims for patent. Did underground surveys, subdivision surveys, road surveys, etc.
- *Mapped entire County of Santa Cruz working from Records records and existing USGS maps.
- *Installed parcel numbering system for tax purposes. Still in use today.
- *Integrated Apache 4-H children with Navajo County 4-H program.
- *Assisted Apaches in improving livestock and farming practices.
- *Worked extensively in land use programs involving public lands in Santa Cruz County.
- *Brought together ranchers, environmental groups and government entities to form consensus on public land uses.

Organizations Belonged To:

Society of Range Management
National Association of Agricultural Agents
Arizona County Agents Association - 2 times President
Epsilon Sigma Phi - Part President
Patagonia - Sonoita Rotary Club - President twice
United Churches Retirement Village Board of Directors - President when I r

References:

Dr. James Christensen, Director Cooperative Extension Service
University of Arizona
(520) 621-7205
Dr. George Ruyle, School of Renewable Natural Resources
(520) 621-7255
Dr. Don Wilkins, School of Renewable Natural Resources
(520) 621-7255
Mr. Ron Morriss, Santa Cruz County Board of Supervisors
(520) 761-7800
Mr. Dennis Miller, County Administrator, Santa Cruz County
(520) 761-7800

Sierrita Mining & Ranching

Tuesday, January 05, 1999

MR. C.H. HUCKLEBERRY
COUNTY ADMINISTRATOR
130 W CONGRESS ST, 11TH FLOOR
TUCSON, AZ 85701

RE: SONORAN DESERT CONSERVATION PLAN STEERING COMMITTEE

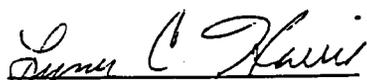
Dear Mr. Huckleberry,

The property owners and community members affected by the Sierrita Mountain Park wish to nominate Lynn C. Harris to the steering committee to speak for this area in the matter of the Sonoran Desert Conservation Plan. We would also like to nominate Heather L. Fox as an alternate in the even Lynn Harris is unable to attend meetings.

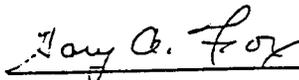
We are not aware of any ranchers, property owners, or mining interests that were invited to, or served on, the group which drew up the Sonoran Desert Conservation Plan. It is therefore imperative, in our view, that the property owners, ranchers, and miners have a voice on the steering committee.

Thank you for your consideration on this matter.

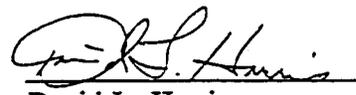
Sierrita Mining & Ranching Co.



Lynn C. Harris
Managing Partner



Gary A. Fox
Managing Partner



David L. Harris
Managing Partner

Copies: Mike Boyd, Chairman, District 1
Dan Eckstrom, District 2
Sharon Bronson, District 3
Ray Carroll, District 4
Raul Grijalva, District 5

Sierrita Mining & Ranching

Tuesday, January 05, 1999

MR. C.H. HUCKLEBERRY
COUNTY ADMINISTRATOR
130 W CONGRESS ST, 11TH FLOOR
TUCSON, AZ 85701

RE: SONORAN DESERT CONSERVATION PLAN

Dear Sir:

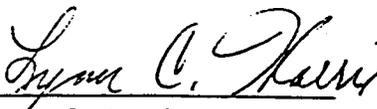
I want to thank you on behalf of our community for the meeting we had with Maeveen Behan and Linda Mayro on Saturday, January 2, 1999. We now have a better understanding of what the county is planning to do and how it affects us, and they have a better understanding of our concerns.

At the meeting, there was a 100% consensus that the designation (Sierrita Mountain Park) be changed to Ranch Conservation, or something more appropriate.

Our community and others living around the Sierrita Mountains are forming a coalition to follow events and express the concerns of the group.

We are anxious for you and each of the Board of Supervisors to visit our community and our ranch. We want the people who govern us to understand our viewpoints.

Sincerely,


Lynn C. Harris

January 5, 1999

C. H. Huckleberry
County Administrator
130 W. Congress St.
Tucson, AZ 85701

Dear Mr. Huckleberry:

I live southwest of Tucson at McGee ranch, on the East Side of the Sierrita Mountains. I have lived here all my life and have no desire to live anywhere else. This has been my family's home since well before the turn of the century, before Arizona was a state or Pima County existed. Six generations of my family have lived on and cared for this land. It is definitely one of the historic ranches in this state.

I am appalled to learn of the new Sonoran Desert Conservation Plan, which would "buyout" ranches in several mountain ranges and turn them into Mountain Parks. Doing so would effectively take away our homeland, our history, and our way of life. If a rancher wants to sell, I see no problem in that. However, I do object to the threat that as a last resort to acquire this "park" the ranch land would be condemned.

We believe in ranch land conservation and one look at our property shows proof of our continuing efforts in protecting land and wildlife in this area. We feel turning the Sierritas into a Mountain Park would have a negative effect on the land and the people who live here. It would bring more traffic to the region and the problems associated with it.

Rather than taking the ranches off the tax base it seems more reasonable to keep them as they are and let the private owners continue to conserve and protect the land. Most of them are doing a good job! There is plenty of public land available to be used without forcing people to sell or have their land condemned.

Sincerely,

James E. Harris

James E. Harris
HC 70 Box 4252
Sahuarita, AZ 85629

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

After reading the draft of the Sonoran Desert Conservation Plan, that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interests of the taxpayers, ranchers or the wildlife.

The people that work and live on the ranch in the Sierrita Mountains have been very successful at improving the water and the grasses. Not only do the cattle benefit from their management program, the wildlife also benefit from the developed water sites and the grass that is planted. The salt and feed blocks are shared by the wildlife as well as the cattle. The pastures are not overgrazed and any disturbed ground is always reseeded.

A group of families began the McGee Ranch in 1895. They were headed for California when traveling difficulties slowed them and they decided to stay. Many descendants of these original families are currently living and working on the ranch.

When the forefathers began the ranch the wildlife was sparse, because there was little water. The management of the springs and building of many dams over the last one hundred and four years has increased wildlife so that even in drought years you see plenty.

The question is; Why now is there a need for the County's Conservation Plan?

The land is already being managed at no cost to the taxpayer and as well the county. The mountainous part of the ranch is under restricted auto access although open to hikers, bikers and equestrians. The lower part of the ranch is open for all access.

You are cordially invited to visit this community and see for yourself the need for a park does not exist in the Sierrita Mountains. The park that everyone is talking about is already there at no cost to the taxpayer. Please consider this:

THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

Mary Ann Bailey
5255 S Park #84
Tucson Az 85701

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

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THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

John C. Orzell
OBA, 1661 W. Prince Rd. #1105
Tucson, Ariz. 85705

January 5, 1999

C.H. Huckleberry, County Administrator
130 W Congress St., 11th Floor
Tucson AZ 85701

Dear Mr. Huckleberry,

In regards to the Sonoran Desert Conservation Plan, we would like to share with you some of our concerns. It is evident that this plan was drawn up without consulting any of the parties directly involved first but rather opposite in fact. If Pima County is needing to comply with a Section 10 permit to continue with regular business wouldn't it make better sense to let the property owners and land stewards participate in planning a program that fits the needs of all? Isn't that our "Constitutional Right"?

The environmental campaign is flooding the United States and its pendulum has swung far to one side. Let's remember that America needs mining, ranching, logging, steel mills, hunting, fishing etc... and environmental issues to survive. We have to have a good balance or we will shut down "The Land of the Free, Home of the Brave".

Everything about this plan that has been published and in the media has deceived the public in depicting that ranching is bad for the land. This is a gross error and deserves an equal chance of defending itself. The stewards of the proposed "Sierrita Mountain Park" and the others have taken exceptionally good care of their lands for over 100 years and will continue in their endeavors to maintain habitat, which would not be if it were not for water development and selective access.

We urge you to scrap this unacceptable plan and help us in saving the people!

Concerned,

Todd E. Harris

Suzanne Harris

Mr. & Mrs. Todd E. Harris

ARIZONA DEPARTMENT OF WATER RESOURCES

Tucson Active Management Area
400 West Congress Street
Suite #518
Tucson, Arizona 85701
Telephone (520) 770-3800
Fax (520) 628-6759



JANE DEE HULL
Governor

RITA P. PEARSON
Director

Chuck Huckelberry
County Administrator
130 W. Congress, 10th floor
Tucson, AZ 85701-1317

Dear Chuck,

As I mentioned to you on the phone, I am interested in participating in development and implementation of the Sonoran Desert Conservation Plan. This plan has the potential to shape this community's future in a very positive way, and I would like to help in any way I can. If it is desired, I can represent the Department of Water Resources by participating on the Steering or Technical Advisory Committee(s). There are a number of direct areas of interest, particularly water rights and wells associated with particular parcels of land, riparian protection and enhancement, and recharge components. Depending on the time required and scheduling issues, Linda Stitzer of my office is also available to assist in any way.

Thank you for briefing me on the Plan and for providing me with the report and summary. I look forward to working with you.

Sincerely,

A handwritten signature in cursive script that reads "Katharine Jacobs".

Katharine Jacobs, Area Director
Tucson Active Management Area

cc: Jim Holway
Linda Stitzer

January 6, 1999

Dudley H. Fox
HC 70 Box 4261
Sahuarita, AZ 85629

Mr. C. H. Huckleberry
County Administrator
130 W Congress St. 11th Floor
Tucson, AZ 85701

Re: Sonoran Desert Conservation Park

Dear Mr. Huckleberry:

I am writing this letter to express my concerns about the Sonoran Desert Conservation Park. I have lived at McGee Ranch for the last 60 years and have been instrumental in building our small community. One of the ways that we made a living was by raising cattle in the Sierrita Mountains. We spent many thousands of dollars improving the mountains by installing watering areas for not just the cattle, but for the other wildlife as well. Because of this, I have seen an increase in deer and other wildlife.

The public has access to the Sierrita Mountains through a walk-through gate at the base of the mountains. It is open to hikers, bike riders, hunters and sightseers. We are doing the very thing you are proposing to do with the "Park", and we are not charging taxpayers for its use.

Our land is not for sale and never will be. We are not "wildcat developing" and we do try our best to keep the land as it should be. We have not hurt the land or animals that live in the Sierrita's, but have helped by providing for the animals with water that would not be there otherwise.

I would like to see my great-grandchildren be able to grow up here, without a park in their backyard. We teach our children to be responsible for the land, to respect it and do the best they can to take care of it. I can't think of a better way to protect land then by teaching our children that it is important to us all.

Sincerely,


Dudley H. Fox

411024251

January 4, 1999

Mr. Huckleberry:

I must protest, and state my opposition,
To your Sonoran Desert Conservation Plan.
And especially To The Sierrita Mt. Park.

This Ranch in The Sierrita Mountains
Known as The McGee Ranch, has been in
my family since The 1890's. Long before
Arizona became a State.

Because This Ranch has been in my
Family, since my Great Grandfather, I take
objection To your Assumption That you
should be able To Take This Land from us
with little or no regard for any of my
family or my wishes or feelings.

Our ranch in The Sierrita-Mountains
is taken care of beautifully. A lot better
I might add Than Pima Co. Takes care of
its Parks.

I go on record as being apposed To your
hostile Take over and will do all I can
to Keep our property.

John C. Harris



United States Department of the Interior

BUREAU OF RECLAMATION

Phoenix Area Office
P.O. Box 81169
Phoenix, Arizona 85069-1169

IN REPLY REFER TO:
PXAO-1500 ENV-6.00

JAN - 7 1999

Mr. C. H. Huckelberry
Pima County Administrator
Pima County Governmental Center
130 West Congress
Tucson, Arizona 85701-1317

Subject: Sonoran Desert Conservation Plan

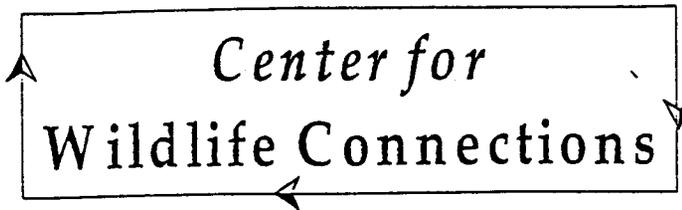
Dear Mr. Huckelberry:

We have received your Sonoran Desert Conservation Plan and support your effort to implement a comprehensive plan to conserve the fragile Sonoran Desert. The conflicts between increased urban development and habitat preservation for sensitive species are complex and will require increasingly unique and varied solutions.

At this time, our role in the development and implementation of the proposed plan is unclear. However, we would like to participate in the process. A well designed plan may prove mutually beneficial to both our agencies. We request that we be included in any future meetings. Ms. Diane Laush, Wildlife Biologist, will be our representative and can be reached at 602-216-3860. Thank you for including us in this process.

Sincerely,

Bruce D. Ellis
Chief, Environmental Resource
Management Division



1520 S. Desert Crest Dr. Tucson AZ 85713
Phone/Fax: (520) 623-3874

Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th floor
Tucson AZ 85701

Re: Sonoran Desert Conservation Plan

January 7, 1999

Dear Mr. Huckelberry,

The Center for Wildlife Connections would like to thank you for formulating the Sonoran Desert Conservation Plan. We believe the plan is an excellent step toward a better future for Pima County.

However, as advocates for preservation of biological linkages, we feel there are many missing linkages in the plan.

Important areas of high biological resource value are also not included. Among these sections missing from the plan are the bighorn sheep calving area in the Silverbell Mountains and habitat where pygmy-owls have been identified by surveys and by high-quality, but unconfirmed observations.

We understand the plan is not in its final version. We feel confident that when solidly based in the science of conservation biology, the multi-species conservation plan will address and rectify any of the areas that may have fallen through the cracks.

Various aspects of the Sonoran Desert Conservation Plan such as Ranch Conservation, Riparian Restoration and Cultural and Historic Preservation are commendable goals and important to our region. However, we believe

the multi-species conservation plan should be finalized and fully funded before embarking on these other ambitious aspects of the SDCP.

Our reasoning is that preserving habitat and endangered species and the shift this may cause in future development trends is the real "powder keg" in our community. We need to defuse this problem as soon as possible, before it destroys us as a community and ruins our chances for a better future.

Again, our thanks for proposing the Sonoran Desert Conservation Plan. We look forward to working with the County and the many stakeholders in creating and implementing the very best plan possible.

Sincerely,
Rob Kulakofsky
Executive Director

A handwritten signature in black ink that reads "Rob Kulakofsky". The signature is written in a cursive, slightly slanted style.

January 7, 1999

TO: The Honorable Pima county Board of Supervisors

FROM: Carl Davis, President
Silverbell Mountain Alliance, Inc.

RE: The Sonoran Desert Conservation Plan

I, Carl Davis, would like to be on the Sonoran Desert Conservation Plan Steering Committee.

I am serving as president of Silverbell Mountain Alliance, dedicated to saving the Silverbell Mountain area. I am against any destruction of saguaros, ironwoods, natural habitat and destruction that is not warranted. I was put in this position by a landscape granite mine starting in our area without anyone's knowledge. I searched out every fact that I could, have monitored things and have tried to have an end put to this destruction of the desert, to no avail.

I also feel that wildlife corridors need to be preserved and areas protected so all areas do not become bulldozed and concrete. Our children need natural desert areas to visit now and in the future.

I have lived in Arizona since 1991, and feel it is a wonderful place to live. Before that, I was a dairy farmer.

My goal is to help protect our area from destruction and the possibility of mines leaving an area that could possibly become a public dumping area.

We also need to protect all the species on our planet. Who knows when it will be our turn to die out. We need to preserve what we have, because once it's gone, that's it!

Please consider me to be on the steering committee, as I pledge to do my utmost to preserve all the areas that I can and will give my full effort to this end.

Thank you.

Carl Davis

RESOLUTION OF THE TOHONO O'ODHAM LEGISLATIVE COUNCIL
(Opposing The Request of Fairfield Canoa Ranch L.L.C., Represented by Frank Thompson/The Planning Center to Rezone Approximately 5,240 Acres From RH (Rural Homestead) to SP (Specific Plans) And Opposing The Proposal to Amend The Pima County Major Streets And Scenic Routes Plan by Adding a Southward Major Route Extension of Camino del Sol Through The Canoa Ranch Specific Plan)

RESOLUTION NO. 99-011

1 WHEREAS, Fairfield Canoa Ranch L.L.C. represented by Frank Thompson/The Planning Center has requested the Pima County Supervisors to rezone approximately 5,240 acres from RH (Rural Homestead) to SP (Specific Plans), located within the San Ignacio de la Canoa Land Grant on both sides of the Santa Cruz River and Interstate 19, generally south of Demetrie Wash, west of the Canoa Road alignment, north of Elephant Head Road, and east of the Land Grant Boundary (Co23-97-02, CANOA RANCH SPECIFIC PLAN); and

WHEREAS, a proposal has been submitted to amend the Pima County Major Streets and Scenic Routes Plan by adding a southward major route extension of Camino del Sol through the Canoa Ranch Specific Plan with a planned right-of-way of up to 150 feet; realigning the Camino de la Canoa major route alignment as a scenic major route with a planned right-of-way of up to 150 feet to follow the Canoa Road alignment along the east boundary of the San Ignacio de La Canoa Land Grant to Elephant Head Road; and, extending Canoa Ranch Road and Elephant Head Road as major scenic routes with planned rights-of-way of up to 150 feet to the new Camino de la Canoa alignment; and

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WHEREAS, the O'odham have lived upon and used these lands located within the San Ignacio de la Canoa Land Grant along the Santa Cruz River, from time immemorial, from days beyond history's records, far past any living memory, deep into the time of stories and legends and regard these lands as part of their sacred traditional home; and

WHEREAS, the O'odham regard the peoples of the Paleo Indian, Archaic and Hohokam

Post-It Fax Note	7671	Date	1/12	# of pages	1
To	Frank Thompson	From	Frank Thompson		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	740-8771	Fax #	291-0613		

RESOLUTION NO. 99-011

(Opposing The Request of Fairfield Canoa Ranch L.L.C., Represented by Frank Thompson/The Planning Center to Rezone Approximately 5,240 Acres From RH (Rural Homestead) to SP (Specific Plans) And Opposing The Proposal to Amend The Pima County Major Streets And Scenic Routes Plan by Adding a Southward Major Route Extension of Camino del Sol Through The Canoa Ranch Specific Plan)

Page 2 of 7

- 1 cultural traditions that lived in southern Arizona from 12,000 BC to AD 1450 as
2 their ancestors; and
- 3 WHEREAS, the United States Indian Claims Commission in 1968, recognized these lands in
4 the Santa Cruz Valley as being traditional-use lands of the O'odham; and
- 5 WHEREAS, the cultural resources located in this area also have importance and significance
6 to the Gila River Indian Community, the Ak Chin Indian Community, the Salt
7 River Pima-Maricopa Indian Community, the Hopi Nation, the Zuni Nation and
8 the Apache Nations; and
- 9 WHEREAS, the National Historic Preservation act of 1966, as amended, 16 U.S.C. 470 et seq.,
10 requires that federal agency preservation activities be carried out in consultation
11 with State and local agencies, with Native American tribes, and with the private
12 sector, and may be applicable to this case because of the action of the U.S. Army
13 Corps of Engineers in issuing a Clean Water Act Section 404 permit; and
- 14 WHEREAS, the American Indian Religious Freedom Act of 1978, 42 U.S.C. 1996, recognizes
15 the rights of all Native Americans, Native Hawaiians, Eskimos and Aleuts to
16 practice their traditional religions and protect and preserve their sacred
17 ceremonial sites; and
- 18 WHEREAS, the Native American Graves Protection and Repatriation Act of 1990, 25 U.S.C.
19 3001 et seq., recognizes the rights of all Native American tribes to protect and
20 preserve the remains of their ancestors, associated funeral goods and objects of
21 cultural patrimony; and
- 22 WHEREAS, the Arizona Burial Discovery Act, Arizona Revised Statutes, Section 41-865,
23 requires developers of private land to consult with Native American tribes

RESOLUTION NO. 99-011

(Opposing The Request of Fairfield Canoa Ranch L.L.C., Represented by Frank Thompson/The Planning Center to Rezone Approximately 5,240 Acres From RH (Rural Homestead) to SP (Specific Plans) And Opposing The Proposal to Amend The Pima County Major Streets And Scenic Routes Plan by Adding a Southward Major Route Extension of Camino del Sol Through The Canoa Ranch Specific Plan)

Page 3 of 7

1 claiming cultural affinity regarding the repatriation and respectful treatment of
2 human remains or funeral objects discovered on their lands; and

3 WHEREAS, the lands within this project area may contain sacred sites and Traditional
4 Cultural Places significant to the O'odham which must be protected and
5 preserved from destruction by this proposed Canoa Ranch development; and

6 WHEREAS, ninety-one prehistoric archaeological sites representing Archaic and Hohokam
7 cultural traditions dating from as early as 5000 BC to approximately AD 1450,
8 have been located in the proposed Canoa Ranch development area and are of
9 significance to the O'odham who feel strongly that these sites should be protected
10 and preserved; and

11 WHEREAS, significant historic sites such as O'odham villages, the Juan Bautista de Arza
12 National Trail, the El Camino Real, the "La Canoa" spring, the Canoa Canal
13 Company canal, the Canoa Ranch and other historic sites have been located in
14 the proposed Canoa Ranch development area and represent significant cultural
15 locations for O'odham, Hispanic, and Anglo peoples and should be preserved and
16 protected; and

17 WHEREAS, the Canoa Ranch development represents a significant threat to the groundwater
18 resources of the area with potential to impact the groundwater and surface water
19 resources of the Tohono O'odham Nation; and

20 WHEREAS, the Canoa Ranch development represents a significant threat to the preservation
21 of the riparian zone along the Santa Cruz River; and

22 WHEREAS, the Canoa Ranch development represents a significant threat to endangered,
23 threatened, and sensitive species including the black-capped gnatcatcher, brown

RESOLUTION NO. 99-011

(Opposing The Request of Fairfield Canoa Ranch L.L.C., Represented by Frank Thompson/The Planning Center to Rezone Approximately 5,240 Acres From RH (Rural Homestead) to SP (Specific Plans) And Opposing The Proposal to Amend The Pima County Major Streets And Scenic Routes Plan by Adding a Southward Major Route Extension of Camino del Sol Through The Canoa Ranch Specific Plan)

Page 4 of 7

1 vine snake, California leaf-nosed bat, crested coral root, Mexican long-tongued
2 bat, Northern gray hawk, Pima Indian mallow, Pima Pineapple cactus, tropical
3 kingbird, tumamoc globeberry, gila monster, loggerhead shrike, desert tortoise,
4 Peregrine falcon and yellow-billed cuckoo; and

5 WHEREAS, the Canoa Ranch development represents a significant threat to the habitat of
6 that part of the Santa Cruz Valley; and

7 WHEREAS, the Canoa Ranch development will contribute significantly to urban sprawl; and

8 WHEREAS, the Canoa Ranch development will contribute significantly to poorer air quality
9 and light pollution; and

10 WHEREAS, the Canoa Ranch Specific Plan does not address and focus on the preservation
11 of significant cultural and natural resources in the project area.

12 NOW, THEREFORE, BE IT RESOLVED THAT the Tohono O'odham Nation's Legislative
13 Council:

14 1. Opposes the request of Fairfield Canoa Ranch L.L.C., represented by Frank
15 Thompson/The Planning Center to rezone approximately 5,240 acres from RH
16 (Rural Homestead) to SP (Specific Plans) located within the La Canoa Land
17 Grant on both sides of the Santa Cruz River and Interstate 19 (Co23-97-02,
18 CANOA RANCH SPECIFIC PLAN) and strongly urges the Pima County
19 Supervisors to reject this rezoning request.

20 2. Opposes the proposal to amend the Pima County Major Streets and Scenic
21 Routes Plan by adding a southward major route extension of Camino del Sol
22 through the Canoa Ranch Specific Plan and strongly urges the Pima County
23 Supervisors to reject this road expansion proposal.

RESOLUTION NO. 99-011

(Opposing The Request of Fairfield Canoa Ranch L.L.C., Represented by Frank Thompson/The Planning Center to Rezone Approximately 5,240 Acres From RH (Rural Homestead) to SP (Specific Plans) And Opposing The Proposal to Amend The Pima County Major Streets And Scenic Routes Plan by Adding a Southward Major Route Extension of Camino del Sol Through The Canoa Ranch Specific Plan)

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TOHONO O'DHAM LEGISLATIVE COUNCIL

Albert Manuel Jr
Dennis Ramon, Legislative Chairman

8th day of January, 19 99

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ATTEST:

Juliana Saraficio
Juliana Saraficio, Acting Legislative Secretary

7 day of January, 19 99

Said Resolution was submitted for approval to the office of the Chairman of the Tohono O'Odham Nation on the 8th day of January, 19 99 at 11:09 o'clock, A.M., pursuant to the provisions of Section 5 of Article VII of the Constitution and will become effective upon his approval or upon his failure to either approve or disapprove it within 48 hours of submittal.

TOHONO O'DHAM LEGISLATIVE COUNCIL

Albert Manuel Jr
Dennis Ramon, Legislative Chairman

APPROVED

DISAPPROVED

on the 8 day of January, 19 99

at 1:45 o'clock, P.M.

Edward D. Manuel
EDWARD D. MANUEL, Chairman
TOHONO O'DHAM NATION

RESOLUTION NO. 99-011

(Opposing The Request of Fairfield Canoa Ranch L.L.C., Represented by Frank Thompson/The Planning Center to Rezone Approximately 5,240 Acres From RH (Rural Homestead) to SP (Speciño Plans) And Opposing The Proposal to Amend The Pima County Major Streets And Scenic Routes Plan by Adding a Southward Major Route Extension of Camino del Sol Through The Canoa Ranch Specific Plan)

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Returned to the Legislative Secretary on the 8th day of

January, 19 99, at 2:10 o'clock, P.M.

Juliana Saraffio
Juliana Saraffio, Acting Legislative Secretary

January 8, 1999

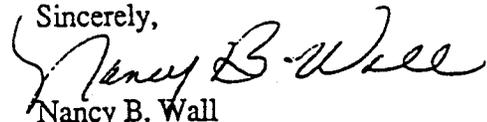
The Pima County Administrator
130 W. Congress
Tucson, AZ 85701
Attn: Maeveen Behan

Dear Ms. Behan:

I realize that I am very late in responding to your office concerning the Sonoran Desert Conservation Plan, but I wanted you to know that although I did not get this letter off to you by the December 28 deadline, I do feel very strongly about this plan and wholeheartedly support it. I feel that this is the most positive step that has been taken in years toward preserving some of what is left of the desert so many of us have come to love.

I am particularly delighted by the concern given to native plant and animal life. It's so discouraging to read day after day about someone making fun of those who would protect the pigmy owl. The battle isn't about an owl--it's about the interconnectedness of all living species, plant and animal. And when we diminish others, we diminish our own. This plan has given me new hope for a future that has looked pretty dismal in the past few years. Thank you for supporting it.

Sincerely,



Nancy B. Wall
2000 S. Doubletree Lane
Tucson AZ 85713
578-2658

Gay Lynn Goetzke
PO Box 667
Vail, Arizona, 85641
Home Phone (520) 762-5956

January 08, 1999

Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

Re: Steering Committee, Multi-Species Habitat Conservation Plan

Dear Mr. Huckelberry,

I would like to express my interest in serving as a member of the Steering Committee for the above mentioned Plan. While admitting to being a skeptic of the current draft of the plan, I am fully aware of the pressure on Pima County to meet the demands by the Federal Government to address the problems created by listings of species under the Endangered Species Act.

It is my belief that you need input from diverse backgrounds in order to come to a true consensus as to the final details of the plan. I have lived in Pima County since 1969, and have seen the pendulum swing back and forth as to growth vs no growth over these many years.

My greatest concern as to this plan is that it is the product of a very few people with a specific agenda, rather than an inclusive, community process. There are many ways to achieve the necessary objective, and I hope that some of these alternatives will be considered.

It is my sincere desire to become a part of this process, and I hereby respectfully offer to help in this regard.

Thank you for your consideration,



Gay Lynn Goetzke

January 9, 1999

Mr. C. H. Huckleberry
130 W. Congress St., 11th Floor
Tucson, AZ 85701

Re: Sonoran Desert Conservation Plan
Proposed Sierrita Mountain Park

Dear Mr. Huckleberry:

Please take a few moments to understand the unique community of McGee Ranch. Our family settled in this area in 1895 (our immediate family has four generations living on the ranch). During the past century, our group has taken excellent care of all the land that makes McGee Ranch.

We learned of the Sonoran Desert Conservation Plan through a report in the Arizona Daily Star. We understand some changes are an inevitable part of life. However, we would like to have some voice in how these changes will affect our way of life. We've been warned that private land will be condemned and taken if landowners don't agree to sell (Arizona Daily Star, 11-20-98, page 4B). We understand the landowners in the Reddington area are being allowed the option of selling or keeping private land (Arizona Daily Star, 11-22-98, page 1B). Shouldn't this privilege be offered to our community?

Please understand we are not against the environmental concerns of the plan. In fact, our community has contributed a great deal to the preservation of our area, and we should be recognized as a group who truly cares for the land. The ranch land has benefited from Sierrita Mining And Ranching's conscientious approach toward cattle grazing. If we were no longer allowed to run cattle on this land, the result would be catastrophic to other wildlife. The water provided for the cattle attracts an abundance of wildlife. The grazing keeps the area from being totally overgrown and inaccessible, and reduces the fire hazard. The families living on the ranch keep a loving and watchful eye over these hills.

We've been told one of the primary goals of this plan is to achieve accessibility to the Sierrita Mountains. For years, this area has been accessible to hikers, horseback riders, bicyclists and birdwatchers. We have tried to limit access to the four-wheel drive vehicles because of the destructive nature of some of the drivers. If the road becomes accessible to all vehicles, there will be a constant cloud of dust over our community.

Our families have been the perfect stewards of this land. We want to keep the land pure and the wildlife in abundance. We have been doing this for one hundred years at no cost

to the taxpayers. Please allow us to protect and preserve the environmental and historic value of our beloved Sierrita Mounatians.

Thank you for your time.

Sincerely:

Neal Harris
Karen Harris

Neal & Karen Harris
HC 70 Box 4631
Sahuarita, AZ 85629

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

After reading the draft of the Sonoran Desert Conservation Plan, that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interests of the taxpayers, ranchers or the wildlife.

The people that work and live on the ranch in the Sierrita Mountains have been very successful at improving the water and the grasses. Not only do the cattle benefit from their management program, the wildlife also benefit from the developed water sites and the grass that is planted. The salt and feed blocks are shared by the wildlife as well as the cattle. The pastures are not overgrazed and any disturbed ground is always reseeded.

A group of families began the McGee Ranch in 1895. They were headed for California when traveling difficulties slowed them and they decided to stay. Many descendants of these original families are currently living and working on the ranch.

When the forefathers began the ranch the wildlife was sparse, because there was little water. The management of the springs and building of many dams over the last one hundred and four years has increased wildlife so that even in drought years you see plenty.

The question is; Why now is there a need for the County's Conservation Plan?

The land is already being managed at no cost to the taxpayer and as well the county. The mountainous part of the ranch is under restricted auto access although open to hikers, bikers and equestrians. The lower part of the ranch is open for all access.

You are cordially invited to visit this community and see for yourself the need for a park does not exist in the Sierrita Mountains. The park that everyone is talking about is already there at no cost to the taxpayer. Please consider this:

THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

Maureen

*form
letter*

*Barbara J McDevitt
4441 N. Via Sinuosa
Tucson, Az 85745*

January 9, 1999

C.H. Huckleberry
130 W. Congress St., 11th Floor
Tucson, AZ 85701

Re: Sonoran Desert Conservation Plan
Proposed Sierrita Mountain Park

Dear Mr. Huckleberry:

The Sierrita Mountains have been my family's homeland for one hundred years. I have definite concerns with the proposed park plan as I feel the general public would not respect the land as we do.

The extra traffic would be a hazard to the many children who live here, and the dust that would be created would be a health danger we don't deserve. I also fear for the general safety of our community if this plan is allowed.

Hikers and birdwatchers have enjoyed access to the mountains for years. They respect and appreciate the land. They're able to observe the rich wildlife that occurs because of the care taken by our ranchers to supply water for these creatures.

The old mountain cabin was home to my parents over seventy years ago. How could this historic site be protected if vehicles filled with people were allowed to invade the area?

These mountains have been lovingly cared for during this past century. Please don't try to fix an area that's not broken!

Thank you.

Sincerely:

Patricia Coughanour

Patricia McGee Coughanour
HC 70 Box 4604
Sahuarita, AZ 85629

Augusta G. Davis
6540 W. Box Canyon Drive
Tucson, AZ 85745

January 9, 1999

Pima County Administrator
Attention: Maeveen Behan, re: SDCP
130 W. Congress Street
Tucson, AZ 85701

Dear Mr. Hucklebery:

I learned of your long-range land-use plan through my membership in the Tucson Mountains Association. I wholeheartedly support the Sonoran Desert Conservation Plan. After living in Tucson for more than 35 years and watching the steady destruction of our Sonoran Desert at the hands of large developers, it is a great relief to see that county administrators have proposed such a plan to arrest urban sprawl.

Thank you for your efforts to implement this Sonoran Desert protection plan.

Sincerely,



Augusta Davis

January 9, 1999

C.H. Huckleberry
130 W. Congress St., 11th Floor
Tucson, AZ 85701

Re: Sonoran Desert Conservation Plan
Proposed Sierrita Mountain Park

Dear Mr. Huckleberry:

The Sierrita Mountains have been my family's homeland for one hundred years. I have definite concerns with the proposed park plan as I feel the general public would not respect the land as we do.

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Thank you.

Sincerely:

Patricia Coughanour

Patricia McGee Coughanour
HC 70 Box 4604
Sahuarita, AZ 85629

Mr. C. H. Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

January 10, 1999

Dear Mr. Huckelberry,

It is most encouraging to watch the reception of the Sonoran Desert Protection Plan during the last few months.

If we are to take the title of this initiative literally, it illicit a profound responsibility not unlike that taken by the original inhabitants. And what an awesome task to establish guidelines for the future of this unique and precious environment.

This plan should protect the future of the Tucson basin for all species, not just the pygmy owl or other endangered species. If a species is not listed as endangered or threatened, then do we ignore it, allow it to be trashed or treat it without a modicum of respect? The creatures that live here were here well before humans and have as much right to this place as we do. Our job is to provide for all living beings and to maintain a symbiotic relationship.

This plan would hopefully address the need for open spaces and wildlife corridors within the city limits as well as the already designated remote park areas in the county. If the plan becomes successful then perhaps it can be addressed to the rest of the county, the state and the region.

Perhaps the most necessary of all life sustaining elements in this desert region is water. Therefore any plan for the conservation of life forms or habitats would necessarily incorporate a sustainable water conservation strategy. Having read the Sonoran Desert Conservation Plan, I cannot find any such water conservation plan or reference to one. Without it we have no sustainable life plan. If there is such a plan for this region, it should be the centerpiece of this strategy. If there is a one hundred year assured water supply for city, why isn't there one for the heavily populated areas of the county?

I live in the eastern Tanque Verde region where supposedly a few Pygmy owls exist. But here are vast mesquite bosques and riparian areas that need attention as ever increasing development consumes more and more water. I can watch the mesquites and cottonwoods dwindle year to year. Without immediate attention, this riparian area in the eastern valley region will become another Santa Cruz cityscape without the presence of the woodlands and wildlife people move here to live with.

There can only be managed growth. If we continue to allow the financial incentive to rule the planning of this region we will only have that which makes the dollar work. Pavement. Malls. Endless urban sprawl. Humans have other needs. The open spaces around us are invaluable to the peace of mind and strength of a entirely pleasing experience here in the desert. People come here from all over the world to marvel at the desert vegetation, the open space and the views. Only in the last few years have the views begun to look like another California, another east coast megalapolis. The private driveways and roads up the hillsides on the edges of town are really unfortunate scars that ignore the basic value of the landscape here. They only exist because there is no ordinance or incentive to control this kind of mindless, selfish development of no benefit to the community.

I am committed in my work of the last twenty years to environmental and cultural conservation. This work embodies the preservation of the essence of any given place and the people who live there from outside interests overwhelming the simplicity of a natural environment. What is unique to this place can only happen here. We may have lost it already to those who cannot see it, who only see "vacant" land of "no value", who blade it clean and import another vision which is imposed on all who live here. We may have lost it already to the massive housing developments that have consumed vast areas of this valley in a few short years, only for the profit in the development, not to enhance the aesthetic value or the experience of living in the desert.

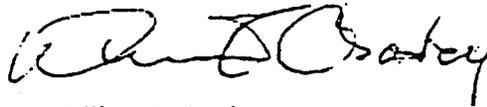
Many communities all over the world have planning initiatives which protect the nature, the integrity of that region. They now have a character which visitors remember of that place, and return there to saturate in it.

I am interested in how this community develops into the future, and would be honored to serve on the Steering Committee to work out a truly significant vision for the Conservation Plan for this Tucson region.

Intelligent development provides a meaningful future.

Resume upon request.

Most Sincerely,



William F. Crosby
Director, ECCO
Environmental & Cultural Conservation Organization
1700 N. Wentworth Rd.
Tucson, Az 85749
749 0585, fax 0587 email skyl@goodnet.com

cc. by snail mail

JANUARY 10, 1999

MR. C.H.HUCKLEBEERY
COUNTY ADMINISTRATOR
130 W. CONGRESS ST. 11TH FLOOR
TUCSON, AZ 85701

RE; SONORAN DESERT CONSERVATION PLAN

DEAR MR. HUCKLBERRY,

I am in receipt of the draft from the Sonoran Desert Conservation Plan and wish to voice my opposition to the entire concept. My family has been in the ranching business since the 1800's and has created a way of life that expects to continue for many more years. We oppose any plan that will effect a change of our livelihood and our future. We ranch on a combination of state, federal and patented land that has been open to the public for the entire time we have lived in Arizona. Any plan to spend taxpayer dollars on a desert conservation plan is ludicrous to say the least. We have private land totaling 4000 acres scattered over a wide area that has always been open to hunting, birdwatching and general access. We have developed water in arid areas that benefit wildlife as well as our stock. The work is always on going to benefit every animal on our ranch. A conservation plan cannot do more to support this area anymore than we have already done. For this reason we are very much against any plans that will take our property and life as we know it from us.

We await and welcome your attention to this matter and are open to any dialogue you care to open.

Respectfully,

Bill Schnauffer

Bill and Clare Schnauffer
PO BOX 457
GREEN VALLEY, AZ 85614
NAVARRO RANCH

Andrada Property Owners
16575 S. Old Sonoyta Hwy
Vail, AZ 85641
(520) 762-1992

1/10/99

Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

Dear Mr. Huckelberry:

As per our discussion with Ms. Maeveen Behan in your office today, we, the members of the Andrada Property Owners Association, request representation on the Sonoran Desert Conservation Plan Steering Committee. We are particularly qualified to be present and participate in consideration and decisions affecting our property which is fully included in the proposed Davidson Canyon Natural Preserve.

Sincerely yours,

Daniel H. Beckel
Dan Beckel
President of the Board



Mayor & Council Memorandum

January 11, 1999

Subject: CITY STAFF ASSESSMENT/RECOMMENDATION
RE: SONORAN DESERT CONSERVATION PLAN
(City-Wide)

page 1 of 3

BACKGROUND

On October 28, 1998 Chuck Huckelbery, County Administrator wrote to the City Manager requesting comments regarding the Draft Sonoran Desert Conservation Plan (attachment A). On December 2, 1998 the City Manager wrote to the Mayor and Council concerning the Pima County Board of Supervisor's meeting with Secretary of the Interior, Bruce Babbitt to discuss the Draft Sonoran Desert Conservation Plan. City of Tucson staff was invited to a briefing prior to the meeting with Secretary Babbitt, that was also attended by representatives of other Cities and Towns, Arizona Game and Fish and the U.S. Fish and Wildlife Service.

City staff prepared an analysis of the Sonoran Desert Conservation Plan that was submitted to the Mayor and Council Public Works and Environmental Subcommittee on December 8, 1998 (attachment B). Maveen Behan, Assistant to the County Administrator and Carolyn Campbell, Director, Sonoran Desert Protection Plan presented an outline of the plan at that time. As requested by the Subcommittee, staff is presenting information and recommendations regarding the Sonoran Desert Conservation Plan today to the full Mayor and City Council.

DISCUSSION

Staff's analysis of the Sonoran Desert Conservation plan is based on existing City policy, the Comprehensive Plan and the Growing Smarter legislation adopted by the State of Arizona this past year. Growing Smarter, HE2361 requires that all jurisdictions in the State adopt updates to the General Plan or Comprehensive Plan by December 31, 2001.

The enactment of the Growing Smarter legislation requires the City to develop four new elements to the Comprehensive Plan:

- Open Space
- Growth Area
- Environmental Planning
- Cost of Development.

Specifically, the legislation calls for the following.

- Revisions to the Land Use Element to identify specific programs for infill or compact form development
- Revisions to the Housing Element to include standards for housing quality, variety and affordability
- Revisions to the Conservation, Rehabilitation and Redevelopment Element to include plans and programs for neighborhood preservation and revitalization.

**Mayor and Council Memorandum
City Staff Assessment/Recommendation
Re: Sonoran Desert Conservation Plan
(City-Wide)**

January 11, 1999
Page 2 of 3

Growing Smarter promotes the following elements as part of its requirements:

- Greater citizen and regional participation
- Closer coordination between local jurisdictions' plans and the State Land Department's plans
- Conformity between the General Plan and zoning.

Implementation of the Growing Smarter legislation will require a significant commitment of City personnel and public involvement over the next 2 years to meet the mandatory completion date.

The Sonoran Desert Conservation Plan is an ambitious undertaking, as is the update to the Comprehensive Plan. Both Plans will require regional participation and cooperation to ensure that all jurisdictions contribute and benefit in proportion to their needs. The Sonoran Desert Conservation Plan calls for an Oversight Committee. The City of Tucson, along with other jurisdictions, has been encouraged to appoint members to this Oversight Committee. City staff believes that the mission and the work program of the proposed Oversight Committee must address the impact of the Growing Smarter Legislation on regional open space, environmental and land use planning.

The City of Tucson has already embarked on an open space planning and implementation effort. The City's acquisition of the Bellota Ranch is a prime example of the City's ability to respond responsibly to opportunities to partner with other agencies to manage and preserve open space. The designation of City owned parcels as open space by the Mayor and Council demonstrates a commitment to implement the Parks, Recreation and Open Space Element of the Comprehensive Plan (attachment C). The past development of major recreational areas adjacent to the major washes such as Lincoln, Udall, and Fort Lowell Parks on the Pantano; Sentinel Peak, El Rio and Silverbell Parks on the Santa Cruz have established an open space pattern for the City.

Currently the City is participating in many of the activities cited in the Sonoran Desert Conservation Plan. These activities include the Multiple Benefit Water Projects, where Tucson Water is using its water resources to recharge, improve and protect natural washes and to visually enhance the community. Additionally, Pima County is a partner with the City in the Kino Sports Park, the Rillito Recharge, the Pima Mine Road Recharge and the Rillito Creek Habitat Restoration Projects.

Half of the present and future Cultural and Historic Projects in the Plan are located within and sponsored by the City of Tucson including the Tucson Presidio, Mission San Augustin, the De Anza Trail and Fort Lowell.

Staff discussed with the Public Works and Environmental Subcommittee holding a special study session to review and bring together many elements related to land use issues within the City of Tucson. These elements can include items that the Mayor and City Council have identified over the past year in their discussions (e.g. infill, sustainability standards for neighborhoods etc.) Staff proposes to schedule this study

**Mayor and Council Memorandum
City Staff Assessment/Recommendation
Re: Sonoran Desert Conservation Plan
(City-Wide)**

January 11, 1999
Page 3 of 3

session in February. Along with the summary of issues, a proposed work plan will be presented. This discussion will allow us to set forth a timeline to meet the Growing Smarter legislation's mandatory deadline.

RECOMMENDATIONS

- Participation by the City on the Sonoran Desert Conservation Plan Oversight Committee will be necessary to coordinate the complimentary work efforts of the City and County. It is recommended that the City Manager be directed to appoint the appropriate staff representatives to the Oversight Committee
- It is recommended that the Planning Department be directed to work with other appropriate City departments and return to the Mayor and Council in February with a summary of issues and a work plan for updating the Comprehensive Plan, at a special study session.

Respectfully submitted,


Luis G. Gutierrez
City Manager

LGG:JSJ;bec

SS / Jan11-99- 25

Attachments:

- A) Letter
- B) Executive Summary: City Staff Review of the Sonoran Desert Conservation Plan
- C) Map



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, TUCSON, AZ 85701-1317
(520) 740-8667 FAX (520) 740-8171

HUCKELBERRY
County Administrator

October 28, 1998

Luis Gutierrez, City Manager
City of Tucson
P.O. Box 27210
Tucson, AZ 85626-7210

Dear Mr. Gutierrez:

On October 27, 1998 the Pima County Board of Supervisors accepted a draft report entitled the *Sonoran Desert Conservation Plan*, and directed staff to forward it to jurisdictions in order to obtain comments during the next 30 days.

The draft *Plan* outlines six elements which could become the cultural and natural resource component of an updated comprehensive plan. Elements include: ranch conservation; cultural and historic preservation; riparian restoration; mountain park expansion; establishment of biological corridors and habitat linkages; and protection of critical and sensitive habitat.

The Board is very interested in receiving comments from the City of Tucson about the draft *Plan* during the next month. These comments can be sent directly to my office and I will provide them to the Board. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "C. Huckelberry".

C.H. Huckelberry
County Administrator

Attachment B

**EXECUTIVE SUMMARY:
CITY STAFF REVIEW OF THE
SONORAN DESERT CONSERVATION PLAN**

City staff applauds the County's efforts to develop a comprehensive habitat conservation plan and believes many elements of the Sonoran Desert Conservation Plan (referred to hereafter as the Plan) address the needs of Pima County's residents regardless of where they live. In this first assessment, City staff will comment on elements of the Plan that we believe require strengthening or elements that need to be added to insure that needs and concerns which most immediately affect our citizens within the corporate city limits of Tucson are appropriately addressed. Staff will elaborate verbally at the Public Works and Environmental Subcommittee Meeting, and will prepare a full written report for the Mayor and Council.

Growing Smarter Legislation

- The Growing Smarter legislation, which requires that all jurisdictions adopt a comprehensive or general plans update by December 31, 2001, is not addressed.
- While the Plan calculates the gross impact of population growth, it needs to give greater weight to the mitigation of adverse effects through the application of environmental regulations such as the Environmental Resource Zone, the Hillside Development Zone, the Wash Ordinance, and the Native Plan Protection Ordinance.
- The newly designated preserves, parks and open spaces are remote from the City and further segregate the human population from the desert around them.
- The Plan should include dedications of open space by the private sector to a greater extent.

Planning Process

- The Plan should follow a comprehensive planning process.
- The development of a public participation process is a requirement for good planning and a specific requirement of the Growing Smarter legislation.

Land Use

- The Plan should identify past Open Space areas such as the Desert Belt and Tucson-to-Tortolita Mountains connection.
- The continuity of Open Space such as Riverparks can and should be more uniformly treated in the Plan.

Attachment B

- Federal programs such as Saguaro National Park expansion should be addressed in the Plan.

Livable Tucson

- The Livable Tucson Vision Process and the 17 goals that call for more natural open space within the City that is accessible by bike or foot can and should be addressed in the Plan.

Water Element

- Pima County's Sonoran Desert Conservation Plan refers to projects that will use reclaimed water or Central Arizona Project water, owned by the City of Tucson.
- These proposed projects would require careful study and consultation with Tucson Water prior to implementation.

**Comprehensive Plan--
Parks, Recreation, Open Space and Trails Element**

The Plan should be consistent with the policies in the Parks, Recreation, Open Space and Trails element of the Tucson Comprehensive Plan listed below:

- Provide interconnected trail system throughout the City and connect open space in urbanized area to surrounding public natural areas;
- Implement an interconnected regional open space system through cooperative public and private efforts;
- Prioritize acquisition and preservation of open space on findings of Pima County Open Space Report;
- Identify and establish sources permanent funding for acquisition and management of open space; and
- Recognize value of cultural, historical and archeological sites as important open space resources.

DESCRIPTIONS OF:

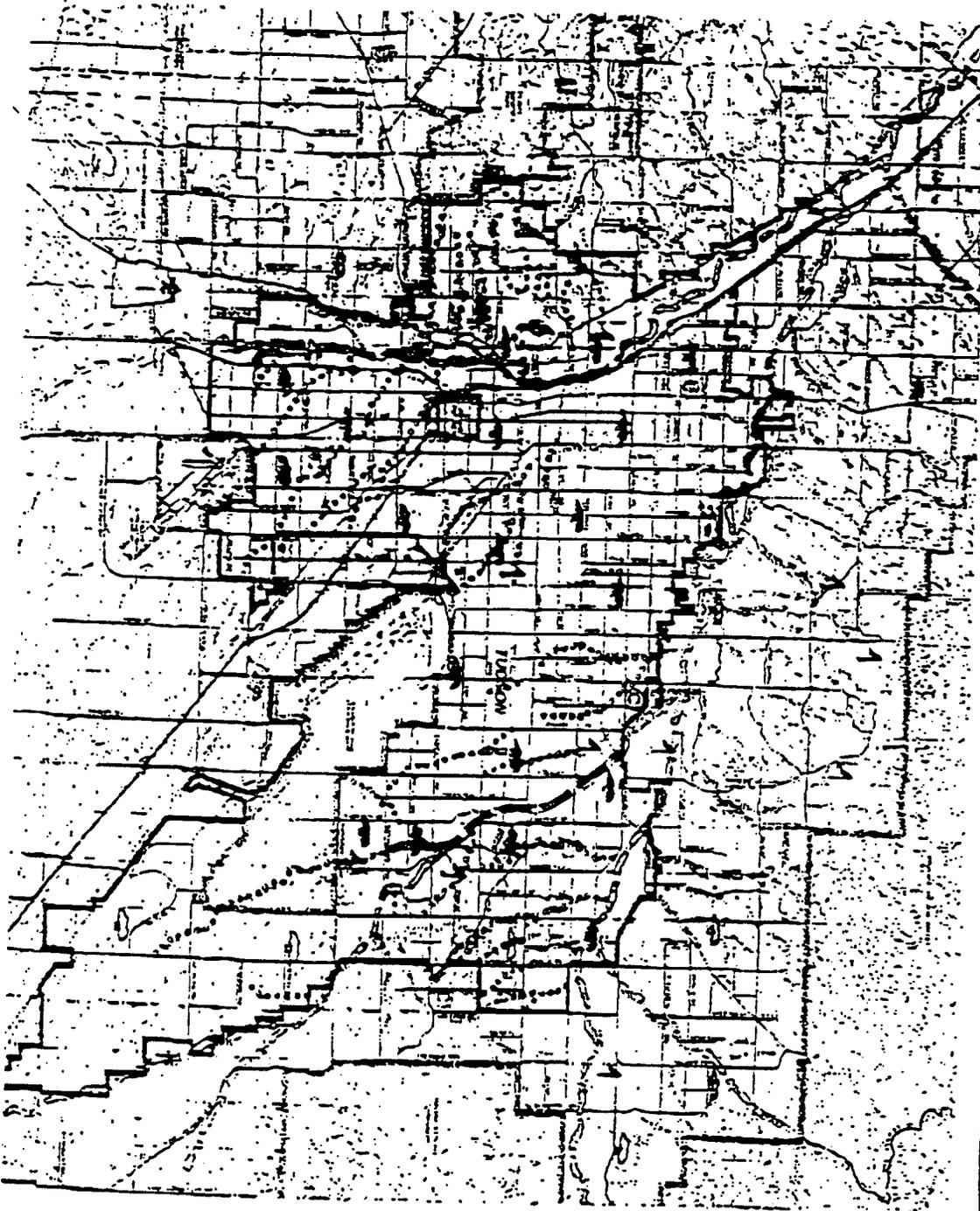
Growing Smarter Legislation

The Growing Smarter legislation requires the addition of four new elements on open space, growth areas, environmental planning and cost of development. The legislation further requires that the elements have regional applicability and specifies that the open space element include a comprehensive inventory of open space areas, provide policies for managing, protecting and acquiring open space areas and strategies for promoting a regional system of integrated open space and recreational resources. The environmental element must contain strategies to address anticipated effects on natural resources created by urban development.

Attachment B

Eastern Pima County Vision

The City of Tucson adopted the Regional Vision for Eastern Pima County in 1990 which foresees an interconnected network of open space including park lands, washes, riparian habitats and public preserves throughout the region. Critical natural areas and designated peaks and ridges are to be protected in a variety of ways, including acquisition by public agencies. The Regional Vision for Eastern Pima County recommendations to provide economic incentives to preserve and restore historic and cultural resources are also consistent with those of the proposed plan. The *Vision* document seeks greater integration of land uses in the urbanized area, including infill development featuring higher density residential development and concentrated commercial activity centers, as well as redevelopment corridors to replace peripheral sprawl.



**CONCEPTUAL
PARKS AND OPEN SPACE**

- City Parks
- City Parks Proposed
- County Parks
- City Openness
- Historic/Archaeological Resources
- Proposed Open Space
- Memorial Parks
- Existing River Parks
- Proposed River Parks
- River Parks Under Design
- Conceptual Openness

Figure 1

Comprehensive Plan
Section 11-Policy 8
Adopted by Resolution # 15309
on December 10, 1990

Source: The City Parks and Recreation Department, 1998, 1999
From: Center for Urban Space (1997)
Author: Peter van der Horst & Peter Cawley, 1997, 1998, 1999

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100-77446-1000-1000
January 11, 1999

Chuck Huckelberry
Pima County Administrator
130 West Congress Street
Tucson, AZ 85701

Dear Chuck:

A few weeks ago I was privileged to hear Maeveen Behan give a presentation to EPAC on the Sonoran Desert Conservation Plan. As I listened, the need for coordinating this Plan with water management objectives quickly became apparent. Individuals who have a strong background in both water and species protection need to be involved in the planning process.

Following the EPAC meeting I contacted Kathy Jacobs and Mark Myers regarding their possible participation and found them to be very interested. Therefore, I am submitting both their names for your consideration. They are extremely well-qualified and their extensive knowledge and talents would be of immense benefit on either the technical committee component or the steering committee. Their resumés are enclosed. Thank you.

Sincerely,



Lois Kulakowski
7541 E. Knollwood Place
Tucson, AZ 85750

cc: Maeveen Behan
Kathy Jacobs
Mark Myers

BIO for Kathy Jacobs

Katharine Jacobs has been the Director of the Tucson Active Management Area since 1988, and has worked for the Arizona Department of Water Resources since 1981. The goal of the AMA is to eliminate the overdraft of groundwater by the year 2025. This requires development of enforceable conservation requirements for all water use sectors, implementation of rules that prevent new subdivisions from using groundwater unless they recharge the groundwater within the same active management area, and facilitation of the use of renewable water supplies. She has an undergraduate degree in biology from Middlebury College in Vermont, and a master's degree in environmental planning from the University of California at Berkeley. Her previous work experience includes developing the Coastal Zone Management Plan for Anchorage, Alaska and working at a marine lab off the coast of Maine.

KATHARINE L. JACOBS
Director, Tucson Active Management Area
Arizona Department of Water Resources
400 W. Congress, Suite 518
Tucson, Arizona 85701
520-770-3817
520-628-6759 (FAX)
kljacobs@adwr.state.az.us

EDUCATION

University of California, Berkeley. M.L.A. in Environmental Planning, 1981.

Professional Project: Coastal Management Plan for Anchorage, Alaska

Middlebury College, Middlebury, Vermont. B.A. in Biology, 1977.

Cornell University, Ithaca, New York. Junior year exchange student in Biology.

HONORS-Academic

Newhouse Grant and Heller Fellowship, Berkeley, 1980.

Award for Excellence as a Teaching Assistant, Berkeley, 1981.

American Society of Landscape Architects Honor Award for the Outstanding Graduate Student in Landscape Architecture, Berkeley, 1981.

Cum laude, Departmental Honors in Biology, Middlebury College.

Elected to Mortar Board, Senior Honor Society, Middlebury College.

Dean's List and College Scholar 1973-1977, Middlebury College.

HONORS-Professional

Supervisor of the Year, Dept. of Water Resources, 1988.

Division of the Year, Dept. of Water Resources, 1989.

Special Achievement Award, Dept. of Water Resources, 1991.

Special Achievement Award, Dept. of Water Resources, 1993.

Nominated for Supervisor of the Year, Dept. of Water Resources, 1994.

Appointed to National Academy of Sciences Panel, 1994.

Katharine L. Jacobs

EXPERIENCE

Director, Tucson Active Management Area, February, 1988, to present.

My responsibilities include managing the Tucson AMA office and its 15 staff members; supervising all planning, operations, compliance, personnel and budget-related activities, and representing the Department in public meetings. My work includes development of mandatory regulations to eliminate groundwater overdraft, policy development, inter- and intra-office coordination, and consensus building in solving water resource management problems. I represent the Tucson area in statewide water issues, and work with community leaders and other agencies to address a variety of local resource problems. I developed and implemented the statewide Assured and Adequate Water Supply Rules, which require municipal water users to shift to renewable water supplies in the major urbanized areas.

Unit Supervisor, Tucson Active Management Area, April, 1986, to February, 1988.

I served as lead planner for the municipal, turf and industrial water conservation programs for the Second Management Plan. This involved analysis of water use patterns, identification of conservation alternatives, working with advisory groups, giving public presentations, conducting meetings, and writing regulatory and non-regulatory sections of the Plan. Related activities included preparation of scopes of work for contracts, contract coordination, and direct involvement with water users.

As supervisor of the Operations and Compliance section of the Tucson AMA, I was also responsible for five employees in charge of public information, maintenance of water right files and computer registries, annual reports, record keeping and compliance and enforcement activities. Activities included development of agency-wide compliance procedures for Management Plan and Code violations.

Water Resource Specialist III, Tucson Active Management Area, September, 1984, to April, 1986.

I developed and implemented mandatory conservation requirements for municipal and industrial water users in the Tucson AMA. This involved identification, notification, and assistance to water users affected by the First Management Plan requirements and development of preliminary approaches for the Second Management Plan. My duties included review and processing of applications for variance and administrative review of management plan requirements.

Katharine L. Jacobs

Water Resource Specialist II, Tucson Active Management Area, March, 1984, to September, 1984.

Responsibilities included finalizing water rights established by 1980 Groundwater Code, and appearing as an expert witness for the Department in administrative hearings.

Water Rights Supervisor, Tucson Active Management Area, September, 1981, to March, 1984.

Supervised and trained personnel involved in verification of groundwater right applications, developed procedures and policies for processing water rights claims, prepared reports for public hearings and Departmental review. Verification required review of ownership documents, aerial photograph interpretation, mapping skills, data analysis, coordination with local government agencies, and working knowledge of the 1980 Groundwater Code.

Coastal Management Planner, Municipality of Anchorage Planning Department, Anchorage, Alaska, 1980.

Prepared Coastal Management Plan for a 25 mile segment of the Anchorage shoreline, including preparation of text and graphics. Published document includes public access, resource protection, and scenic area elements, in addition to recreation facility designs and trail locations.

Teaching Assistant, University of California, Berkeley, 1979 and 1980.

Responsible for teaching three field courses in site planning and field ecological analysis. Subject matter included principles of ecology, hydrology, land use, elementary surveying, field sampling, air photo analysis, and vegetation mapping.

Administrative Assistant, Shoals Marine Laboratory, Cornell University, Ithaca, New York and Appledore Island, Maine. February 1978 to September 1979.

PARTICIPATION/MEMBERSHIPS

- Southern Arizona Water Resources Association and Tucson Regional Water Council Board of Directors (current);
- Arizona Town Hall (current);
- Arizona Hydrologic Society (current);
- American Water Works Association (current);
- American Water Resources Association (current).
- Citizens CAP Oversight Committee - City of Tucson 1994;
- Tucson AMA representative to Citizens Water Advisory Committee, Tucson Water (1982-1992);
- Joint Tucson/Pima County Effluent Committee (1992-1993);

MARK H. MYERS

Education.

Master of Business Administration, Management, University of Arizona, 1981
Bachelor of Science with High Honors, Human Services, California State University,
Fullerton, 1977

Professional Summary.

Consultant--Land Use, Water Resources and Environmental Policy

Mr. Myers has broad expertise in balancing the policy concerns and economic considerations involved in the integrated management of real property, natural resources and water rights. He has 15 years' experience with structuring complex, multi-party transactions and with the planning and implementation of multiple use projects. He has worked extensively with private, non-profit and public entities. Mr. Myers has a special interest in projects and policy issues that require balancing economic development needs and sensitive environmental concerns. He also has particular expertise in developing the institutional framework and management structure for multiple participant, multiple purpose projects that cross established jurisdictional boundaries.

Professional Experience.

Consultant, 1993 to Present

Mr. Myers' private consulting practice focuses on multiple purpose projects related to land use, natural resources, water policy and environmental policy. He specializes in structuring cooperative projects involving multiple participants and/or requiring the balancing of economic development and environmental issues. With his background in finance, economics and management, Mr. Myers has a strong business orientation that complements his expertise in resource policy and land use. In addition to his direct consulting work, Mr. Myers has also affiliated with Science Applications International Corporation (as Senior Specialist in resource management) to work on larger projects with regional, national or international scope.

Palo Seco Companies, 1981 to 1993

Mr. Myers served as vice president and chief operating officer for a family of investment companies specializing in investment real estate, asset management, finance and complex transaction brokerage. He had primary responsibility for all aspects of operational management and strategic planning.

Professional Experience (Continued).

Lane, Pontius and Myers, Inc., 1990-1992

Mr. Myers was co-owner and senior consultant for a consulting firm specializing in public land, natural resource and environmental policy issues. Clients included Federal and state agencies, as well as an array of local governmental agencies and private sector entities.

Other Professional Experience.

Since 1981, Mr. Myers has provided management consulting expertise to a diverse group of start-up and rapidly growing small businesses. He specializes in the organization and operation of new companies, as well as management of problems related to rapid growth and limited liquidity.

From 1988 to 1992, Mr. Myers was one-third owner of Accounting Resources Corporation, which provided bookkeeping, accounting and information management services to business and professional clients. He sold his interest in Accounting Resources Corporation in 1992.

While a graduate student at the University of Arizona from 1980 to 1981, Mr. Myers worked as Business Manager for the Laboratory of Isotope Geochemistry on campus. Prior to that time, he worked for two years as Administrator for the Tucson Wellness Center, Inc., a non-profit health education agency. He began his professional career as Assistant Program Manager and then Controller for Project INFO, Inc., a non-profit drug abuse prevention program in Whittier, California, from 1976 to 1978.

Community Involvement.

1996-Present Arizona Water Banking Authority Study Commission. Commission formed by Arizona State Legislature to make recommendations regarding in-state and interstate banking of Colorado River water. Chairman, Interstate and Intrastate Marketing Subcommittee.

1996-Present Tucson Regional Water Council Advisory Committee.

1985-Present The Nature Conservancy, Arizona Chapter. Vice Chairman, Stewardship, 1993-1997. Treasurer, 1989-1992. Board of Trustees, 1988-1997. Advisory Board, 1997-present. Chairman, Marketing Working Group, 1994-1996. Co-Chairman, Projects and Public Policy Committee, 1992-1993. Chairman, Muleshoe Ranch Planning Task Force, 1989-1990. Chairman, Finance Committee, 1987-1989.

1983-Present Arizona Town Hall. Participant, 42nd, 47th, 59th and 68th Arizona Town Halls.

1991-1994 Santa Cruz Valley Water District. Gubernatorial Appointment. Chairman, 1993-1994. Vice Chairman, 1991. Board of Directors. 1991-1994.

Community Involvement (Continued).

- 1987-1993 Southern Arizona Water Resources Association. Vice President, 1990-1992. Board of Directors, 1987-1993. Chairman, Central Arizona Project Committee, 1990-1992. Chairman, Second Management Plan Review Committee, 1987-1989.
- 1992 City of Tucson Stormwater Technical Advisory Committee. Appointed by Mayor and Council.
- 1986-1988 Cerebral Palsy Foundation of Southern Arizona. Vice Chairman, 1987-1988. Board of Trustees, 1986-1988.
- 1981-1987 Water Utilities Association of Arizona. Treasurer, 1985-1987. Board of Directors, 1983-1987.
- 1982-1987 Tucson Metropolitan Chamber of Commerce Land Use Committee. Chairman, 1986-1987.

Honors.

Phi Kappa Phi National Scholastic Honorary
Beta Gamma Sigma National Business Honorary
University of Arizona Graduate Academic Scholarship
CSUF Alumni Association for Academic Excellence and Community Service

Personal Information.

Date of Birth: October 9, 1953
Spouse: Tamra Whiteley-Myers, M.D.
Children: Lauren (age 10)
Thomas (age 8)

Office: 5800 N. Camino Arturo
Tucson, Arizona 85718
Phone: (520) 742-0416
Fax: (520) 742-0587
e-mail: mhmyers@aol.com

MARK H. MYERS

REPRESENTATIVE PROJECTS

Northwest Tucson Active Management Area Replenishment Program, Tucson, Arizona.

Ongoing development and coordination of multiple purpose, multiple participant public works program in the northwest quadrant of the Tucson metropolitan area in southeastern Arizona. Program consists of three major projects combining groundwater recharge and recovery, regional flood control, environmental enhancement and recreation. Sponsors and financial contributors include ten local, state and Federal jurisdictions and agencies.

Southern Arizona Regional Water Management Study, Pima County, Arizona.

SARWMS is a planning effort for water resources management for the northwest portion of the Tucson metropolitan area that builds upon the feasibility study for the Northwest Replenishment Program described above. SARWMS broadens the geographic scope of the planning process, lengthens its timeframe, and increases the scope of planning to include all renewable water resources (effluent and surface water); water acquisition options including exchanges, leases and outright purchase; and a full range of potential utilization options, not just recharge and recovery. Three new water providers are participating in SARWMS that were not participants in the Northwest Replenishment Program feasibility study.

National Park Service, Yosemite National Park.

- (1) Evaluation of environmental consequences of emergency repairs to El Portal Road, following major flood in January, 1997. Working as part of SAIC team, researched and wrote sections on history of road and associated improvements, and biological resources baseline conditions. Helped develop mitigation plan.
- (2) Again working with SAIC team, participated in development of Environmental Assessment for permanent reconstruction of El Portal Road. Primary responsibility for executive summary and cumulative impacts sections of reports. Assisted in drafting biological resources affected environment and environmental consequences sections, as well as mitigation recommendations.

Arizona Army National Guard.

Environmental Assessment and environmental training curriculum for the activation of a national guard armored unit at Fort Huachuca. Worked with team from Science Applications International Corporation. Responsible for ensuring that policy concerns related to water resources, coordination with other agencies and jurisdictions, and cumulative impacts of mission changes at the Fort were adequately addressed. Drafting responsibility for report sections dealing with cultural resources and cumulative impacts.

MARK H. MYERS

REPRESENTATIVE PROJECTS (continued)

Water Rights Settlement Negotiations--Santa Cruz Active Management Area, Arizona.

Ongoing negotiations to develop a consensus plan for conjunctive management of surface and groundwater in the Santa Cruz AMA, including drought management; to develop implementation mechanisms and the institutional framework for instituting the plan; and to quantify, prioritize and settle surface and groundwater rights and claims in a form acceptable to the Gila River Adjudication court. The negotiations include most of the key water resources players in the region, and Mr. Myers represents private water rights owners.

Groundwater Rights Acquisition, Tucson and Phoenix, Arizona.

Represented Boyce Thompson Arboretum, Space Biospheres Venture and Arizona/Sonora Desert Museum in evaluating water rights needs and/or acquisition of water rights to meet those needs. Additionally, represented private sector buyers and sellers in the purchase, sale and/or lease of groundwater rights on several occasions.

Arizona Chapter, The Nature Conservancy, Tucson, Arizona.

Chaired working group that planned facilities development for the Muleshoe Ranch, a 54,000 acre natural area owned and cooperatively managed by the U.S. Forest Service, the U.S. Bureau of Land Management and The Nature Conservancy. Tasks included integrated planning for resource management and public access, plus planning and development of guest facilities for revenue generation on the Conservancy-owned portion of the ranch.

Pinsa Group, Inc., Pension Trust, Nogales, Arizona.

Assessment of portfolio of 15 properties throughout Arizona acquired by Pinsa as a result of loan defaults. Issues addressed included physical condition, market conditions, environmental concerns, potential uses and disposition strategies.

Central Arizona Project Restructuring, Arizona.

Researched, wrote and edited policy papers that provided basis for discussion of interstate marketing, instream recharge and Indian water rights settlements as critical pieces of an overall CAP restructuring. Assisted with the development of realistic policy positions for a coalition of environmental groups. Key components of the water marketing and Indian settlements proposals were incorporated into the final restructuring recommendations. The State legislature has adopted statutes that permit and encourage instream recharge, and has established and funded the Arizona Water Protection Fund as a result of those recommendations.

MARK H. MYERS

REPRESENTATIVE PROJECTS (continued)

Pima County, Arizona.

Assessed potential for reimbursement from Arizona Water Quality Assurance Revolving Fund (WQARF) for clean-up costs for lead-contaminated site adjacent to Santa Cruz River. Included review of and opinion on the quality of Phase 1 and 2 environmental studies of site that failed to identify the nature or extent of contamination, plus development of information on potentially responsible parties.

Nevada Land and Resource Company, Nevada.

Worked with SAIC team to develop disposition strategy and Federal land exchange plan for 1.4 million acres of land in northern Nevada. Primary responsibility for evaluating Bureau of Land Management exchange lands inventory in Clark County, Nevada, and assessing capability and interest of BLM in conducting exchanges with client.

Palo Seco Corporation, Tucson, Arizona.

Coordinated large multi-party land exchange involving the U.S. Bureau of Land Management, the U.S. Forest Service and more than 30 private landowners. Involved more than 10,000 acres and required almost three years to complete.

BKW Farms, Inc., Pima County, Arizona.

Helped coordinate BKW's role in development of major groundwater recharge projects and transport of CAP water to those projects in the Avra Valley northwest of Tucson. Representation of BKW in negotiations with Pima County Flood Control District for the acquisition of several hundred acres of BKW-owned land required by the County for flood control and recharge activities.

Amado Properties, Santa Cruz County, Arizona.

Researched and developed water resource value-enhancement strategy for 780 acre property with groundwater rights and a verifiable pro-statehood claim for surface water rights. Supervised assembly of documentation on original homesteads and patents, plus preparation and filing of surface water rights filings. Developed strategy and worked with attorney/lobbyist to ensure protection of Amado's interests in both the drafting of the Assured and Adequate Water Supply regulations and the establishment of the Santa Cruz Active Management Area. Ongoing representation of client in development of management plan for AMA.

MARK H. MYERS

REPRESENTATIVE PROJECTS (continued)

Fort Huachuca, United States Army.

- (1) As part of team from Science Applications International Corporation, worked on preparation of Environmental Assessment for consolidation of western states' civilian personnel offices at Fort Huachuca. Primary responsibility for cultural resources and cumulative impacts portions of EA. Shared responsibility for threatened and endangered species sections of EA.
- (2) Again working with SAIC team, working on ongoing mountain-front groundwater recharge program for Fort Huachuca. Tasks include assisting with drafting of Arizona Water Protection Fund grant proposal and providing guidance relative to the policy and political considerations involved in planning and implementing a recharge program.
- (3) Participated on SAIC team that rewrote Environmental Impact Statement for the Installation Future Development Master Plan at Fort Huachuca. Primary responsibility for cumulative impacts and cultural resources sections. Additional responsibilities included input regarding water resources, policy issues and public involvement.
- (4) Part of SAIC team that prepared Environmental Assessment of Fort Huachuca Air Show. Prepared cumulative impacts and cultural resources sections.
- (5) Working with SAIC, prepared the cultural resources section of Environmental Assessment for the deployment and training of the 208th Transportation Company, U.S. Army Reserve, at Fort Huachuca.

Office of the United States Nuclear Waste Negotiator, Washington, D.C.

Assisted U.S. Nuclear Waste Negotiator in assessment of land use, natural resource impacts and sociopolitical issues with respect to possible sites for the Monitored Retrievable Storage Facility for high-level civilian radioactive waste, primarily spent nuclear fuel.

World Bank/Republic of Senegal.

Assisted consulting team from Booz Allen & Hamilton and Republic of Senegal with existing project comparison (Salt River Project & Central Arizona Project) for Canal du Cayor feasibility study.

Central Arizona Water Conservation District, Phoenix, Arizona.

- (1) Analysis of appropriateness of cost allocations related to environmental mitigation measures undertaken during the construction of the Tucson Aqueduct of the Central Arizona Project.
- (2) Assessment of land ownership and environmental considerations related to the possible use of Butler Valley as an underground storage basin for Central Arizona Project water.

MARK H. MYERS

REPRESENTATIVE PROJECTS (continued)

Arizona Water Banking Authority Study Commission, Phoenix, Arizona.

The AWBA Study Commission has a legislative mandate to evaluate the operations of the Arizona Water Banking Authority, to assess the potential water banking and/or marketing needs of constituencies within Arizona, and to recommend changes in the statutes governing the AWBA before the 1999 legislative session. Mr. Myers chairs the Interstate and Intrastate Marketing Subcommittee of the Study Commission.

AWBA Recovery Plan Baseline Data Survey, Tucson and Phoenix, Arizona.

Worked with team from WestLand Resources to research recovery requirements and options for Arizona Water Banking Authority recovery plans for the Phoenix and Tucson Active Management Areas. Primary responsibility for policy analysis, and provided support for economic and financial analysis.

1/11/99

PROTEST LETTER RE SIERRITA MOUNTAIN PARK

The McGee Ranch was homesteaded by my grandfather in 1800's, long before Arizona became a state of the Union. Our family (over 100 families) have lived here for many years and we just were informed that Bruce Babbit from the federal government has decided to take our ranch supposedly so that it will not be developed. He is promising to give the Pima County Government millions tax dollars to do just that.

No one asked us and no one informed us of this endeavor. We first learned about it in an article in the Arizona Daily News, Nov 19, 1998.

For anyone's information, we have never developed this ranch nor do we intend to. It is to be sold to no one for any reason. We have developed water for the animals and anyone is welcome to come up and enjoy the mountains without a fee.

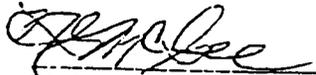
If the government takes this ranch away from us for millions of tax dollars and loses millions of tax dollars they now receive and have to pay millions of tax dollars to keep it up, what do you think we the tax payers are going to feel about this expensive act proposed by the federal and county governments.

Who gave the government the right to take our water, our grave yard, our historical sites, our religion, our life style and our land away from us?

According to a Nevada news article, (See enclosed Article: "HAGE WINS 'CRUSADE' WITH FEDS, ENVIRONMENTALISTS Northern Nye rancher prevails in years-long dispute over property rights, water, grazing,") published Dec 18, 1998 in the Pahrump Valley Times, Judge Smith, Chief Justice of the United States Court of Federal Claims, was appalled when he heard tapes between the environmentalist and the government officials plotting to drive ranchers off their lands throughout this Country and fined them 30 million dollars for damages. Could the Sonoran Desert Conservation Plan be part of this plot?

I protest this Sonoran Desert Conservation Plan.

Sincerely



N-G McGee

HC 70 BOX 4579

Sahuarita, AZ 85629

Hage wins crusade with feds, environmentalists

Northey-Nye rancher prevails in years-long dispute over property rights, water, grazing

Rayne Hage says the 126-year-old family ranch in the lower state's rights, those who are proponents of a central government.

Described as the most remote area in the lower states, Hage's 700,000-acre ranch, "God's C... That policy case... would come as no surprise... Hage's family's... long... with... property rights... battle of good... (See page 2)

It was 1872, the year that the federal government began... Back then, the... Rockefeller and... beginning to... government corruption... government was... city rights... Hage's... most often... all... interest... (interest...)

Robber barons with names like... Morgan and Carnegie were... of personal wealth and govern... accidently... the West, the... tag most... over prop... Hage's... most often... all... interest... (interest...)

Southey-Nye rancher... 126 years old... just outside of... family... to worry... Indians... and... and... an... in... Hage's... most often... all... interest... (interest...)

Southey-Nye rancher... 126 years old... just outside of... family... to worry... Indians... and... and... an... in... Hage's... most often... all... interest... (interest...)

Southey-Nye rancher... 126 years old... just outside of... family... to worry... Indians... and... and... an... in... Hage's... most often... all... interest... (interest...)

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Southey-Nye rancher... 126 years old... just outside of... family... to worry... Indians... and... and... an... in... Hage's... most often... all... interest... (interest...)

Southey-Nye rancher... 126 years old... just outside of... family... to worry... Indians... and... and... an... in... Hage's... most often... all... interest... (interest...)

Hage

(Continued from A-1)

federal judge last month, the long war is about a year away from a final cease-fire, and like all wars, there has to be a winner and a loser.

In this case the government, specifically the U.S. Forest Service and the Bureau of Land Management, figure to lose and lose big — to the tune of perhaps as much as \$30 million in damages.

As for the winner, Hage and his family aren't the only victors. From other ranchers to local government entities and everyone in between, the landmark case will set a precedent that will ensure a government run amok is kept in its place.

The most recent battle began in 1971 when Hage filed suit against the two federal land management agencies, who, at times from the end of a gun, stole away key property rights from the rancher — property rights most Americans, especially in the West, take for granted. Water, grazing allotments, ditch rights on way and foliage, to name a few.

The government raised the stakes, charged Hage with violating land management laws, and nearly succeeded in putting the rancher in prison.

Judge Loren Smith, Chief Justice of the United States Court of Federal Claims, heard testimony from both sides during a week-long hearing in October, a hearing in which Hage's attorney, Ladd Bedford, proved beyond a reasonable doubt Hage's title to the property rights seized by the government.

Smith also sided with an opinion issued by the Nevada State Engineer in which it was determined the water was Hage's. The ditch rights of way, and the forage, too, were deemed to be Hage's. Most important, Smith said the government failed to properly respond to previous acts of Congress, which specifically mandate western land management has to respect and protect the customary usage of the range.

When Hage filed the lawsuit in 1971, there were 2,000 head of cattle and roughly 1,500 calves on his ranch. Today, nearly a cow can be seen anywhere. It's kind of like owning a grocery store, but the feds won't let you stock

your shelves," he said. In response to Smith's ruling, Hage earlier this week said the matter was cut and dry. "It was either legal what they did, or it was illegal."

Hage said the government's willingness to destroy him and his family was not so much against the Pine Creek Ranch, but against property owners throughout the west. "The point is," he said, "with just a touch of rancor, 'the feds don't want people to understand how to defend their property."

"If I win, others win and that creates problems. They've done everything they could to obstruct the real issues. In the wake of Smith's ruling, in which Hage prevailed on all the major issues, the key to keep from snatching defeat from the jaws of victory is to ensure the definitive ruling on property rights is fact specific.

"The whole strategy of the Forest Service," maintains Hage, "wasn't based on acts of Congress, but the policy of the National Wildlife Federation, the Sierra Club, and the Natural Resource Defense Council."

Hage admits he was a little reluctant to fight the government, until he realized it wasn't the government as much as those three private environmental groups who were the real enemy.

"These guys want dominance over the land," he said. "And their philosophy has been adopted by the USFS and BLM."

"You think you're dealing with a federal agency. Once you understand the USFS and BLM co-opted the socialist stance of the Sierra Club, then you know how to fight their anti-property rights stance."

A key element of Hage's victory, according to the rancher and his attorney, is what was revealed during the discovery process before any hearing was held.

Though the agencies initially balked at providing Bedford with audio tapes of conversations between environmentalists and government officials, Hage said the tapes revealed a plot to use the USFS and BLM to "drive ranchers out." It would be called the plot of collectivism.

The tape's contents, said Hage, was described as "appalling" by Judge Smith.

"This is a very unique case, and I'm awestruck by what's been accomplished," Hage added. "That anything has been accomplished at all, especially in favor of the long-time rancher, can also be attributed to

the government. A government Hage said should have left well enough alone.

"I would have quit early on," Hage said. "They were able to defund us, they were able to isolate me from the Cattleman's Association.

"I would have thrown in the towel — until they brought criminal charges against me and threatened to put me in prison. That's when my family and I decided to fight to the end."

Hage said the government's relentless pursuit provoked the people behind the move against him were not only evil, but vicious. "They're willing to destroy a man's family to satisfy their own desires. Luckily, there were a lot of good people behind us, and we were able to face that evil. It was a case of either we win or lose. There was no middle ground once they backed us into a corner."

A few years ago, during the criminal aspect of Hage's case, he was convicted in a federal courtroom of illegal removing debris from his own stream. His wife was convicted at gunpoint, and his ranch operations were closed down, also at the point of a gun.

The conviction, he says, came thanks to federal employees willing to perjure themselves in a court of law. But Hage would never spend a day in prison, due to an appeal his attorney lodged with the Ninth Circuit Court of Appeals.

"They reversed (the conviction)," said Hage, noting with no small amount of irony the Ninth, headquartered in San Francisco, is easily the most liberal of all federal appeals courts in the U.S., and the least likely to sympathize with him.

Not only was Hage's conviction reversed, the federal prosecutors were verbally reprimanded and came with hairbreadth of official sanction for malicious prosecution.

A spokesman from the Federal District Attorney's office in San Francisco declined to comment on the case. "It's been a positive thing," said Hage, reflecting on past seven years and the hardship and heartache he endured. "At least we've been able to give the general public an idea of how to protect themselves."

There are still no cattle in God's country, but Hage the day's coming when they'll return to graze on plentiful high desert foliage.

"I'll be able to put groceries back on the shelves soon," he said.

January 11, 1999

Mona (Monna) Allen Wolters
HC 70 Box 4621
Sahuarita, Arizona 85629

Dear Mr. Huckleberry,

I am writing to let you know that I am opposed to the plan of making the Sierrita Mountains into a park as stated in the Sonora Desert Conservation Plan. I am a fifth generation Harris to live at McGee Ranch. I have not always lived here at McGee Ranch. I grew up in Tucson, but I am a part of the family nonetheless. McGee Ranch played a very important role in my childhood.

No one has ever had more of a love or caring for the land than those who were raised at McGee Ranch. These people have nurtured and cared for these mountains like no one else ever could, because it has been their home for generations. Please get to know the people from Sierrita Mining and Ranching. With an open mind you can not fail but see that they are truly the conservationists of the Sierrita Mountains.

Sincerely,

Mona Allen Wolters

January 11, 1999

Michael Timothy Wolters
HC 70 Box 4621
Sahuarita, Arizona 85629

Dear Mr. Huckleberry,

I am writing to let you know that I am opposed to the Sierrita Mountains being made into a park. I am a sixth generation Harris living at McGee Ranch.

J.R. McGee, Daniel Harris, and George Harris homesteaded this land in the 1800"s. If you will carefully look at how their ancestors have cared for and nurtured the land you will see that those at McGee Ranch have been the conservationists of the land all along.

Sincerely,

A handwritten signature in cursive script that reads "Michael Wolters".

Michael Wolters

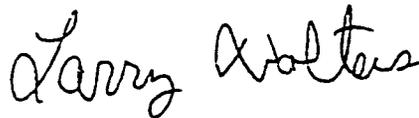
January 11, 1999

Larry J. Wolters
HC 70 Box 4621
Sahuarita, Arizona 85629

Dear Mr. Huckleberry,

I am opposed to the Sierrita Mountain Park as outlined in the Sonora Desert Conservation Plan. My wife Mona(Monna) is a fifth generation Harris, and my grown children are sixth generation Harris'. What I have seen in the thirty years of being affiliated with the family at McGee Ranch is that they have been, are now, and will continue to be the only guardians of the land that is needed.

Sincerely,

A handwritten signature in cursive script that reads "Larry Wolters". The signature is written in dark ink and is positioned above the printed name.

Larry J. Wolters



Box 5906. Tucson, Arizona 85703-0906

January 11, 1999

County Administrator Chuck Huckleberry
c/o Maeveen Behan
130 W. Congress Street
Tucson Az 85701

Pima County Board of Supervisors
130 West Congress Street
Tucson, Arizona 85701

By Fax: 884-1152

RE: Sonoran Desert Conservation Plan

Dear County Administrator and Supervisors:

The Tucson Mountains Association fully supports the Sonoran Desert Conservation Plan and its goals.

Sincerely,

Carol Klamerus, President

TUCSON MOUNTAINS ASSOCIATION

CK/hf

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

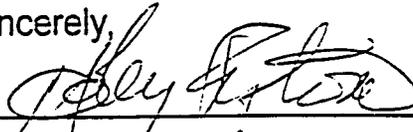
Comments:

Keep up the good work!

My specific concerns regarding the Plan are:

Don't let developers manipulate land values to the County's disadvantage!

Sincerely,



(Signature)

Holly Finstrom

(Printed Name)

1901 Azahar 85745

(Address)

TUCSON MOUNTAINS ASSOCIATION

Dear Mr. Huckleberry:

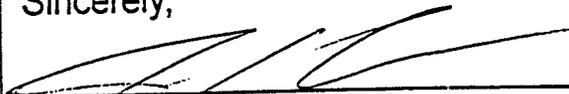
I am a member of the Tucson Mountains Association.
I support the Sonoran Desert Conservation Plan.

Comments:

My specific concerns regarding the Plan are:

No Upzoning's are vital!

Sincerely,

 (Signature)

Jayne Kahle (Printed Name)

6681 N. Broadway Drive (Address)

Tucson, AZ 85743



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Tucson Field Office
12661 East Broadway Blvd.
Tucson, AZ 85748-7208

(520) 722-4289

In reply refer to:
1610 (060)

January 12, 1999

Mr. Chuck Huckleberry
County Administrator
130 West Congress, 10th Floor
Tucson, AZ 85701

Dear Mr. Huckleberry:

The Bureau is pleased and excited about the possibilities the Sonoran Conservation Plan Concept brings to the multitude of biological, historical, and cultural resources throughout Pima County. As a land manager within Pima County we would like to be considered as a steering committee member for the planning effort. In addition, we have a wide variety of specialists that may be assets for the scientific and technical groups that will probably be necessary to accomplish this undertaking.

I hope the current conceptual framework will have enough flexibility to allow for enhancements to area boundaries in order to meet jurisdictional, biological and cultural needs. In some cases that may mean the expansion or removal of portions of some areas. This could best be determined through the course of the planning process. In addition, several of us have received calls from permittees and landowners asking about the opportunities to exchange or purchase lands identified in or adjacent to the conservation areas identified. We are very willing to support these efforts but feel this would greatly benefit all players involved if this was carried out in a coordinated effort through the planning process.

I would like to suggest we take the opportunity to present this effort to the Southwest Strategy's Regional Executive Committee in order to develop a strong level of awareness, recognition and support across several agencies. This is an excellent on the ground example of what the Southwest Strategy Group is looking for in local collaborative processes that have a high potential for success.

Thank you for the opportunity to be a partner in this forward thinking effort to conserve our natural, biological, and cultural heritage for future generations.

Sincerely,

Jesse J. Juen
Field Manager

Jane Dee Hull
Governor

Dennis Wells
State Land
Commissioner

Arizona
State Land Department



1616 W. Adams Street Phoenix, AZ 85007 (602) 542-4621 www.land.state.az.us

January 12, 1999

C. H. Huckelberry, County Administrator
Pima County Governmental Center
130 West Congress
Tucson, AZ 85701-1317

RE: Draft Sonoran Desert Conservation Plan; Agency Comments

Dear Mr. Huckelberry:

Thank you for offering the Arizona State Land Department (ASLD) the opportunity to review and comment on Pima County's draft Sonoran Desert Conservation Plan. As the administrator of the 9.3 million acres of State Trust lands statewide, and more than 800,000 acres in Pima County, the ASLD endeavors to take an active partnering role with local government in the development of local land use plans such as the subject document. The Draft Sonoran Desert Conservation Plan ("Draft Plan") represents a notable continuation of the vision that was shown in the Open Space Committee report of the 1980s, and we commend the Pima County staff and your office for the time and effort that the Draft Plan represents.

The draft could begin to serve as part of the open space element of the new Comprehensive Plan that Pima County will be required to adopt in accordance with the 1998 Growing Smarter Act. A fair amount of work would be required to do so, and particular attention should be paid to the public participation element of the act. Also, incorporating past Pima County efforts such as the Eastern Pima County Trails Master Plan and the Trails Access Plan of the 1970s would bring in the user component to the open space system.

We applaud the plan's vision and comprehensive scope in defining the boundaries of a regional open space system in the unincorporated areas of Pima County. However, we do have a number of comments and concerns about certain aspects of the document, and these will comprise the bulk of this letter. The form of our comments will move from the general to the specific.

General Comments

Role and Scope of State Trust Land Sales in Pima County

Early in the Draft Plan (pages 3 and 4, "Ownership of Land in Eastern Pima County") there is a discussion of the role of State Trust land in setting the urban form of the county. Specifically, the Draft Plan states that, "...many State Trust lands will eventually be sold or leased for private

purposes." While there is some truth to this statement over the long term, we would like to provide some perspective based on our historic practice and scope of dispositions.

During the past ten years of exceptionally rapid growth, ASLD land sales in all of Pima County have totaled 11,469 acres. Of this total, approximately 16% has been sold to development interests. The balance of ASLD's sales in Pima County have been to local and tribal governments, utilities, schools, and to mining interests. The majority of sales to mining interests were in the form of conversion of existing leases for tailing ponds, not the sale of undeveloped lands for new mining operations. Two important points arise out of these numbers: first, there has been no "fire sale" of State Trust lands to developers in Pima County; and, second, the scale of land disposition proposed by the Draft Plan - 103,072 acres - would take over 100 years to process at our present rate and given our present staffing resources. Although a specific timeline for these acquisitions under the Draft Plan is not identified, an unprecedented volume of sales within a relatively short timeline would be difficult to justify to our beneficiaries as being in the best interest of their Trust.

Arizona Preserve Initiative Eligibility

On Page 4 of the transmittal memo to the Draft Plan, Policy Recommendation #4 suggests that the Board of Supervisors should direct its staff to pursue Arizona Preserve Initiative (API) petitions on most if not all of the identified State Trust land acreage. As noted in detail below, many of these areas are not eligible for such designation. Further, we would recommend that, of those areas that are potentially eligible for classification as *suitable for conservation*, these petitions be phased over time to increase the likelihood that funding will exist to successfully purchase or lease these lands at public auction should the State Land Commissioner determine that it is in the best interest of the Trust to designate them as such.

In the case of lands that are eligible for API designation, we must consider our various legal mandates and obligations. While the primary purpose of API is to conserve unique natural features and/or habitat, one of the legal justifications for API is that it would amenitize and increase future value on the remaining undeveloped adjacent State Trust lands. Since many of the areas designated for conservation under the Draft Plan would encompass entire blocks of Trust land, the bulk of the increased value brought about by conservation sales and leases would likely be realized on adjacent private land holdings. This scenario is clearly problematic for the Trust as it would be difficult if not impossible to argue that it meets the mandate of the Arizona Constitution and the Enabling Act.

As you know, Proposition 303 matching monies can be used for lease or sale of state lands designated as suitable for conservation under the API and for purchase of development rights for other state lands once that program comes into fruition. They cannot be utilized to purchase or lease lands in fee that are not eligible under the API program. API-ineligible lands can be purchased at auction, but not under API and not with "Growing Smarter" matching funds.

If API-ineligible lands were to be offered to Pima County at auction, statute requires them to be reclassified to *commercial* and the grazing leases canceled. Depending on the property, this may not be desirable from a land management perspective. There are other options that should be considered, including, but not limited to, conservation leasing of API-eligible lands and working on conservation easements with private landholders adjacent to state lands of longer term concern.

Conservation of Ranching Properties

In general, ASLD shares Pima County's desire to maintain ranching operations on the vast majority of State Trust lands in Pima County. Conservation of ranch lands identified by the plan as a priority will involve a number of creative techniques, but all require the active participation of ranch owners. There are also many other ranches in the county other than the ones identified; perhaps a comprehensive strategy may be in order as the lands perceived to be threatened today may or may not be the flashpoints of tomorrow.

The most important point we can make is that buying a ranch does not buy the State Trust land that is leased by that particular rancher. Rather, those leases would be assigned to the new landowner. If the new landowner chooses not to conduct ranching operations on this property, the State Trust lands involved would no longer be eligible for a grazing lease. If, however, the grazing leases were to continue on non-API lands, then we need to note for the record that the lands involved are no more protected than any other land leased for grazing. Therefore, in this scenario, ASLD can accept proposals for higher and better land uses and cancel the existing grazing leases. As examples, the Empire/Cienega, Posta Quemada, and Empirita ranches are not "preserved" as the Draft Plan indicates. We would encourage Pima County to reevaluate the ranches identified in the Draft Plan and prioritize which of these ranches are to be targeted for conservation.

Endangered Species Act Issues

The ASLD, representing the interests of the State Land Trust, has been keeping abreast of issues associated with the cactus ferruginous pygmy owl in northern Pima County, and now in Maricopa, Cochise, and Pinal Counties, as the critical habitat area has been proposed. We recognize further that the Draft Plan contemplates a multi-species approach. Before creating a habitat conservation plan, ASLD would urge Pima County and other participants to explore with us the legal issues involved such as:

- The applicability of the Endangered Species Act to Arizona State Trust lands.
- ASLD's ability to participate in mitigation activities
- The rights of ASLD lessees.

The interested parties in Pima County will need to proceed with great deference to the legal obligations, plans, investments, and rights of land owners, State Trust lessees, and the Trust beneficiaries. While at this point it is unclear which entity will be the lead agency in drafting a habitat conservation plan, ASLD requests that as courses of action are continually refined and debated, that the Department and our lessees be actively involved prior to any recommendations

or decisions going forward. If owl or multi-species habitat is ultimately identified on both trust and private lands, the trust land should not be singled out for preservation as a trade-off for destruction of similar habitat on private lands for development.

Fire Management

As the responsible wildfire management entity on private, State Trust, and non-Federal public lands, the State Land Department would like to see fire management issues addressed in the final plan. Wildfire management strategies are very different depending on the relative importance of the type of resources (structures, wildlife habitat, etc.) for which protection is necessary.

Specific Comments

Ranch Conservation

The Draft Plan makes assumptions about the preservation status of several ranches. As an example, the Empire/Cienega Ranch was purchased and is managed by the Bureau of Land Management. The state grazing leases, which make up a large percentage of the property, have no preservation status and are in direct conflict with management desires of the BLM. As land exchange authority does not exist, the issue of the status of the state leases should be recognized as not settled and something that the county might wish to address before taking on many new projects.

Historic and Cultural Preservation

While lying within the corporate boundaries of the City of Tucson, Esmond Station ought to be considered for addition to the list of future projects. There has been a pending sale on this property since 1992.

Riparian Restoration

On Page 15, the Draft Plan indicates that the County "will encourage" ASLD to set aside land along certain significant riparian areas. As you know, though, we have no ability to set aside Trust land for this purpose under our constitutional mandate and statutory authority. Short of providing protection within the context of development (unlikely in most of these places) the County or another entity would have to take some positive action to ensure that occurs. A number of these are identified under the funding section of the report.

Mountain Parks

A large number of acres of State Trust land in many of the expanded or proposed parks are not eligible for API designation. Much of the ineligible land is classified for *grazing*, and as previously discussed, the Department intends to maintain these lands for *grazing* over the long term. Alternative means of conservation should be considered. ASLD is unlikely to move many of these properties to development in the foreseeable future. Land exchanges, as mentioned on

Page 28, will be a study topic for the Growing Smarter Commission. Federal condemnation, another possibility, would need congressional authorization.

Habitat, Biological, and Ecological Corridor Conservation

No State Trust lands appear to be included within these proposals.

Critical and Sensitive Habitat

On Page 22, reference is made to "habitat owned by... the state and other public entities." This reference should be changed to refer to ASLD properties as "State Trust land" rather than "public" land, thus accurately reflecting the true legal status of these properties.

Land Use Policy

1. Categorically assuming that the existing zoning is better than upzoning in all instances is probably not the case. There may be solutions that do involve upzoning which would enable acquisition of the most sensitive lands in a given area at no additional cost to the county. The same may apply to rezoning time extensions, the fourth proposed policy.
5. Many of the proposed mountain parks are likely slated for a time period far beyond the ten year life of comprehensive plans. Their plan designation should allow some flexibility for interim and alternative land uses, whether resource productive or development related, should a mountain park fail to materialize.
6. ASLD is generally supportive of local initiatives. However, in order to avoid potential conflicts with property owners' rights, ordinances should be supported with written proof of necessity and justification.
7. An ordinance can allow for transferrable development rights, but should not transfer them without separate actions and agreements. It is suspected that this is what was meant by this proposal.
8. Rather than create new zones particularly for those above the state subdivision law, working with private property owners to create conservation easements or private deed restrictions running with the land may be more viable alternatives.
11. There are a variety of land banking alternatives that could be considered. These should be investigated and debated, and enabling legislation sought if necessary.

Figures

The title on Figure 2 is not quite accurate insofar as the Santa Rita Experimental Range and much of the Empire/Cienega is State Trust land. Alternate wording other than, or in addition to "Public" would be more appropriate.

Figure 3 has a number of errors, but mostly needs an updated legend.

Figure 4 actually depicts grazing and agricultural land use on private, state, and federal lands and should be labeled as such. The bulk of the trust land on the map is ranched, as is much of the federal land.

Figures 4, 5, and 12 should be prefaced with "Existing and Proposed".

Is Cienega Creek (Figure 7) considered a natural preserve or mountain park? Map shading and the legend appear to differ.

State Trust land in the following proposed preserve areas may or may not be eligible for classification under API: Davidson Canyon (Figure 8), Mescal Arroyo (Figure 11), and the Catalina State Park Expansion (Figure 16). The latter will likely be eligible after the year 2000 Census results are reported. Further discussion should occur to clarify the potential status of these areas.

State Trust land in the following proposed preserve areas is not eligible for classification under the API: Buehman-Bingham (Figure 9), Penitas Wash (Figure 10), Colossal Cave Mountain Park expansion (Figure 15), Santa Rita Mountain Park (Figure 17), Cerro Colorado Mountain Park (Figure 18), Waterman-Roskrige Mountain Park (Figure 19), Sierrita Mountain Park (Figure 20), and the Helvetia Grasslands Conservation Area (Figure 21).

The Tortolita East Biological Corridor, the Tortolita Mountain Park western expansion area and the Tortolita Ironwoods Area (Figure 13) appear to be configured to almost exclusively apply to State Trust lands. Rather than identifying a potential preserve area that appears to encompass mostly State Trust lands defined by section line boundaries while leaving the adjacent private lands open to development, we would prefer to see the potential preserve area defined by the actual location(s) of environmentally and ecologically sensitive areas on both State Trust and private lands as determined by experts in the various fields of natural resource management. This would both remove the burden of the State Trust lands having to carry the majority of the weight for preservation efforts and allow development within agreed-upon parameters to take place on non-sensitive lands when market conditions warrant.

In Figure 14, it is unclear due to map coloration whether Tumamoc Hill properties are designated merely as State Trust land or bond open space parcels. It is our understanding that only the eastern half of Section 16 in Township 14 South, Range 13 East should be identified as the latter. The same coloration issue also suggests that state and county staff should meet as to whether identified State Trust lands in the Tucson Mountain Park area are eligible for designation under the API.

Preliminary Work Plan to Achieve Interim and Long-Term Goals Related to Endangered Species and Habitat Protection

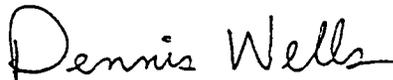
On page 7 of the Preliminary Work Plan on Endangered Species and Habitat Conservation, the first bullet should recognize that the map identifies public, State Trust and private lands. In the next to last paragraph on the page, while certainly we recognize that State Trust lands will play a role in a proposed interim plan, it should not do so without compensation to the trust or to the exclusion of impacts to private land. To our understanding, the map itself does not indicate pygmy owl habitat as the map legend suggests, as that critical habitat has not yet been defined.

Conclusion

It is important to have a vision, to think bold and lay out a plan that excites. Pima County's Draft Sonoran Desert Conservation Plan has taken this first step. It is also important to be pragmatic in what is reasonable to achieve over both the near- and long-term, to provide alternative land uses in the interim that allow for the reasonable use of property, to note whether existing resource productive uses would continue to occur or be phased out, and to ensure that the plan accounts for operation and management costs, as well as capital costs for acquisition. We look forward to the opportunity to work with the County to refine the plan, and insofar as Trust land is concerned, provide for a meaningful open space system while still being responsible to the Trust beneficiaries.

Thank you again for the opportunity to comment. If you have any questions or require further information, please contact Arlan Colton at (602) 542-2643 or Mark Edelman at (602) 542-2644.

Sincerely,



J. Dennis Wells
State Land Commissioner

JDW/me

c: Arlan Colton, Director, Arizona Preserve Initiative
Michael E. Anable, Deputy State Land Commissioner
Maria Baier, Office of the Governor, Phoenix
Steven Jewett, Office of the Governor, Tucson
Gail Kobetich, U.S. Department of the Interior

Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

January 12, 1999

Re: Sonoran Desert Conservation Plan, MSHCP Steering Committee

Dear Mr. Huckelberry:

Women for Sustainable Technologies takes a great interest in the progress of the Sonoran Desert Conservation Plan. Central to our mission statement is the encouragement of sustainable communities. We see the SDCP as an opportunity to discover how to meet the need for housing and commercial growth without the destruction of the environmental resources of our region.

In light of our interest, the WST Board would like to be represented by Lisa Stage on your Steering Committee to coordinate development of a regional Pima County multiple species habitat conservation plan. In addition to several years' participation in WST activities and administration, she holds leadership positions in other local organizations such as the Tucson Peace Center, a non-profit networking organization for local peace, social justice and environmental groups, and the Tucson Solar Alliance. We would greatly appreciate the opportunity to have her grassroots and sustainability perspective at the table in representation of the interests of WST.

Sincerely,



Vivian Swearingen
President
for the Board of Directors



women for sustainable technologies



Line by Line
Editorial Services

8381 E. Hillwood Ct. Tucson AZ 85750
(520) 296-3691

January 12, 1999

Charles Huckelberry, County Administrator
Pima County Administrator's Office
130 W. Congress, 10th Floor
Tucson, AZ 85701

Dear Mr. Huckelberry:

I am very interested in your Sonoran Desert Conservation Plan, and would like to be considered for the Steering Committee or any other related committee or task force. I serve on all four governmental committees at the Tucson Metropolitan Chamber of Commerce, and would like to be an active participant in the Conservation Plan. I have previously discussed this interest with Ms. Maveen Behan when she was a guest speaker at the Chamber.

Enclosed are my business card and brochure. The brochure outlines some of the services *Line by Line* provides. *Line by Line* is registered with the City of Tucson Procurement Office, and is certified by the City of Tucson Equal Opportunity Office as a woman-owned business.

I hope I can be of some help with your upcoming projects, either as a volunteer or in my professional capacity. I look forward to working with you.

Sincerely,

Lucy G. Vitale
Editor

Encl.

Denelope Harris
HC 70 Box 4601
Sierrita, Az 85629

Mr. C.H. Huckleberry
County Administrator
Pima County, Az

Dear Mr. Huckleberry,
My name is Denelope Harris & I
am a 43 yr resident of McEwen Ranch.
My husband is a junior partner in
Sierrita Mining & Ranching Co. which
is located in the Sierrita Mountains.
We are very concerned about the
proposal which would take much of our
private as well as State & Federal Leased
land. We raised our six children
here & they in turn our raising
most of our 19 grandchildren here.
This land is very precious to us
as well as a large part of our livelihood,
and we are very upset that anyone
would consider condemning it to
take it from us for the proposed
Sierrita Mountain Park.

We have taken very good care of
all of this land. We have provided
water not only for cattle but for the
abundant wildlife that we enjoy.

We have provided easy access
through a walk through gate for
numerous hikers & bikers who have

also enjoyed our land for years.
We already allow the use of our
land by others for everything
that the county has mentioned
in their plan.

I thank you for your time
& I pray that you will give
much thought & attention to this
situation & will help us to get
the Sierrita Mountain Park removed
from the Sonoran Desert Conservation
Plan. We invite you to come up
& see these things for yourself.

Sincerely

Penelope Harris
(520) 425-2455

January 12, 1999

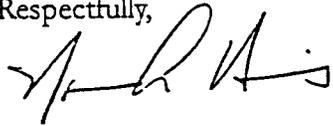
C. H. Huckelberry, County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, AZ 85701-1317

Dear C. H. Huckelberry, County Administrator:

My name is Norman L. Harris I would like to go on record that I oppose the Sonoran Desert Conservation Plan as it is written.

I have been a resident of McGee Ranch located in Pima County all my life. I am part of the fifth generation to be born and raised on McGee Ranch. I have a wife and three children ages 19, 18, and 16 they would be the 6th generation to live on McGee Ranch. I do not understand the need for the county to include the Sierrita Mountains in their plan. We have been good stewards of the land and will continue to be if left alone. I believe taking this property to be an unnecessary tax burden on the residents of our community. I am the office manager for Sierrita Mining & Ranching Co. I can tell you that we have maintained this property at great expense the way it is with no help from the county. I do not mean this in a derogatory way. We do not expect help. I believe this county was founded on the rights of its citizens to obtain and use the land for their prosperity, as it states in the constitution of the United States of America. If in fact this plan is in the works because of a mandate from the federal government, take their land it composes more than 20% of eastern Pima County. The State of Arizona has in its control another 50%. How much do we need? We are surrounded by National Forests maintained by the taxpayers.

Respectfully,



Norman L. Harris
HC 70 Box 4577
Sahuarita, AZ 85629

cc: Sharon Bronson, Pima County Supervisor

January 12, 1999

C.H. Huckleberry
County Administrator
130 West Congress St.
Tucson, Arizona 85701

Dear Mr. Huckleberry,

I am very disappointed with your decision to back Mr. Babbitt in his efforts to take over so many lands under the guise of "preservation". This may apply to some lands but not the Sierrita Mt. area. The land here is being very well preserved as it stands. If you open this up to the "people" on 3 sides, it will not be preserved anymore. You know how destructive "people" are.

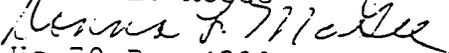
What about our water supply that comes from these hills? Are we to be run off our lands because you have cut off our water? What about the towers that exist on Keystone Peak? Will you ruin that for the owners of them? What about the cattle? I am aware that the goal of the environmentalists goal is to eliminate all cattle ranches all minning, and all forestry in this country. What are you going to do when there is no more beef for your dinner? Or no more lumber for building, nor metals for everything else?

Have you ever read the Constitution? I believe it reads that government is not to be involved in business nor is it to own property. It was written to protect our agency. We are surely losing all of that.

If you back any program suggested by the environmentalist you can't care about people. These environmentalist are out to destroy civilization as we know it.

A very disappointed citizen

Donna L. McGee



Hc 70 Box 4380

Sahuarita, Arizona 85629

Judy Ann Fox
HC 70 Box 4257
Sahuarita, AZ 85629

January 12, 1999

C.H. Huckleberry, County Administrator
130 W. Congress St., 11th Floor
Tucson, AZ 85701

Dear Mr. C.H. Huckleberry,

I'm writing to you to express my concerns over the Sonoran Desert Conservation Plan. Since the Sierrita Mountain Park Plan is especially affecting my immediate lifestyle and consuming my thoughts, I oppose this plan.

I live at McGee Ranch, at the foot of the Sierrita Mountains. It has been in the family since the late 1800's. Some of these people are six generations here. That should make some real roots. These mountains have been shelter, comfort, recreation and nature's beauty. Many groups, churches organizations come to enjoy the nature. Our hills can be enjoyed by all with no charge. Why would we want to ask our tax payers to pay for something that most will never use. We have many parks close around to us already, like Mt. Lemmon, Madera Canyon, Tucson Mountain Park, Piccacho Peak, and so on.

I'm just rewriting to keep our private land private not to open up our mountains for a commercial business.

I've not dealt with communicating with our elected officers much before, but what I have read and heard of the Plan - it sounds like a dictatorship, and the country I live in is not run that way.

In conclusion, just leave the Sierrita Mountains the way they are.

Sincerely,


Judy Ann Fox

JAF/mkb

Sheldon G. Fox
HC 70 Box 4257
Sahuarita, AZ 85629

January 12, 1999

C.H. Huckleberry, County Administrator
130 W. Congress St., 11th Floor
Tucson, AZ 85701

Dear Mr. C.H. Huckleberry,

I am writing in regards to the Sonoran Desert Conservation Plan that is being considered by Pima County and would like to go on record as being opposed to the taking of more land then Pima County can afford to pay or or manage. I feel that with the amount of National Forest, BLM, State lease land and National Monuments that we already have a very unique area of protected lands. With the removal of more private land, our tax base, which is already quite small, will continue to decrease and add more taxes.

In regards to the Sierrita Mountain Park, which I live near, I do not feel that this area meets the criteria for the endangered species act and as their is no natural flowing water, it does not meet the needs of the Conservation Plan. Sierrita Mining and Ranching the major land holder is a family enterprise, dating back over 100 years, and has made a very serious effort over the years to preserve the land and with considerable expense to develop water for wildlife and livestock. The land has always been open for hiking, picnicking, hunting and other wholesome activities and will continue to be kept that way for all to enjoy. So it does not seem prudent in the best interest of Pima County, financially wise, to try to take over this ranch, when it has been managed in such a careful way, over so many years.

Sincerely,



Sheldon G. Fox

SGF/mkb

Tuesday, January 12, 1999

Pima County Supervisors
C/O C.H. Huckelberry
130 W. Congress
Tucson, AZ. 85701

Board of Supervisors

My name is Les Harris and I live at McGee Ranch in the Sierrita Mountains. I would like to go on record as being opposed to Pima county making the Sierrita Mountains a county park. Our ranch is a family run operation which was started about 100 years ago. As part of our livelihood our people understand the importance of taking care of the natural resources that we depend on. For this reason we been very faithful to take care of the range, wildlife, and water holes over the decades. The thing that upsets me the most is the fact that none of the members of our community were included in the beginning stages of the counties plans. We were not aware of this plan until the news papers started printing stories about the Sierrita Mountain Park. I am 39 years old and have lived here all my life, and am the fifth generation to live here. I do not want to lose my way of life so again I would like to say that I strongly oppose the plan for the Sierrita Mountain Park.

Les C. Harris



HC70 Box 4626
Sahuarita, AZ 85629-9311

Sierrita Mining & Ranching Co.

Tuesday, January 12, 1999

CH HUCKLEBERRY
PIMA COUNTY SUPERVISOR
130 W CONGRESS ST 11TH FLOOR
TUCSON AZ 85701

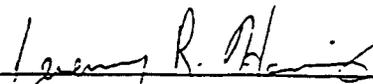
RE: SONORAN DESERT CONSERVATION PLAN

Dear Mr. Huckleberry,

My name is Jeremy R. Harris and I'm a junior partner in Sierrita Mining & Ranching Co. I have been a resident of McGee Ranch all my life (28 years) and have three children ages 6, 3, and 9 months. My wife Diona M. Harris and I would like to go on record that we oppose the Sonoran Desert Conservation Plan as it is written.

I am part of the fifth generation born on McGee Ranch. I do not want the Sierrita Mountains to be a part of this plan. We as a community have taken care of this land for over 100 years. I cannot understand how the county in any way could take better care of the land than we have.

Respectfully,



Jeremy R. Harris
Sierrita Mining & Ranching Co.

Stephen R. Bacchus
HC 70 Box 4531
Sahuarita, AZ 85629

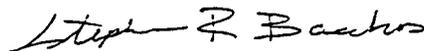
January 12, 1999

C.H. Huckleberry, County Administrator
130 W. Congress St., 11th Floor
Tucson, AZ 85701

Dear Mr. C.H. Huckleberry,

I am going on record as strongly opposed to Sonoran Desert Conservation Plan and particularly the Sierrita Mountain Park - the local, state, and federal Governments already own and/or manage too much land in Arizona. Private land owners and ranchers are the most endangered and important species in our state. To take care of our lands and to protect Arizona's heritage, our land must be taken care of by the best stewards of the land - Ranchers and private land owners. Government bureaucracy is not the answer.

Sincerely,



Stephen R. Bacchus

SRB/mkb

Melissa K. Bacchus
HC 70 Box 4531
Sahuarita, AZ 85629

January 12, 1999

C.H. Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, AZ 85701

Dear Mr. C.H. Huckleberry,

I am writing to you to express my concern in the Sonoran Desert Conservation Plan. I live in the Sierrita Mountain Park Plan area. And I live it here. It should not be a sight that is included in your plan. My reasoning is basically family oriented. Now to you, that might be insignificant, but if you think about it, family is essential. My family has lived here for 6 generations. Now, when do you get a chance to hear of that? All generations in the same place.

We live in property that is private land, but yes we do lease the land that is trying to be taken away. We have always paid our dues on the leases. So we do not feel we should be punished. And yes this is a punishment. We do not want to loose this land. It is very important to us. We use the land for grazing and use the water from it. We are not doing any developing on it, so basically we are preserving it ourselves. We do not want the Government to do it. That is like a slap in the face to those people that love the land. We do not need to pay more taxes just for you to say this property is a park. And the other people that love this land are hikers and hunters that enjoy the land and they don't abuse it. Now if you make this a park, that might bring more people up here that it then might get abused

Our family came here and decided to settle here and we so respect that. So please do not just take land from people, that has not been looked at, or talk with them about it. Not just our land but any of the land in this plan.

Sincerely,

Melissa K Bacchus

Melissa K. Bacchus

Dear Mr. Huckleberry,

I am very upset to find out that my children's family history is going to be taken away. This is concerning the Sierrita Mt. This is very wrong. There are lots of families who go into these mountains to hunt, my husband hunts for deer every year it is very needed in our family because we are so large and meat is so expensive. We have a family of 7 and growing. Our children enjoy the freedom of hiking in the mountains. We also go to the Homestead where my children hear stories about their Grandparents and Great Grandparents. They are able to see where they worked and how they built their first home.

The McGee Ranch is also a working ranch with cattle all around. There are many families who depend on this type of income. We are a community besides a family. This is a very special place to a lot of people. We take care of the land and the mountains. If you open this up to the "people" on 3 sides, it will not be preserved any more.

You know how destructive people can be. There are many people who get water from this mountain. Will you take water from these people ?

We are citizens and we have the right to keep our land and mountain.

There are plenty of parks. We don't need to push families off to have another .

Help us keep our land and heritage.

Very Disappointed,

Kathy McGee
HC 70 Box 4774
7600 W. McGee Ranch Rd.

Kathy McGee

Charles E. Bristow
HC 70 Box 4529
Sahuarita, AZ 85629

Tuesday, January 12, 1999

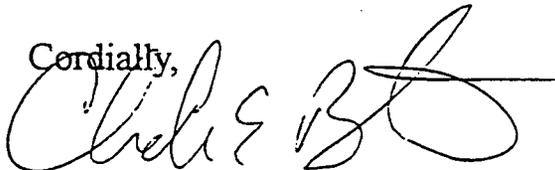
C. H. Huckelberry, County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, AZ 85701-1317

RE: Sonoran Desert Conservation Plan

Dear Mr. Huckleberry:

I have lived in the Sierrita Mountains since 1986 and my wife was born and raised there. I have reviewed the Sonoran Desert Conservation Plan and must tell you as a registered voter I am firmly against this! There is NO need to include the Sierrita Mountain Range. We have kept this land open to the public and well maintained at no charge to taxpayers. I feel our rights have been violated and that no real time was spent investigating this. I have joined the Sierrita Mountain Coalition to help fight this and I am sending letters to every newspaper in Pima County to help shed the light on this injustice. I have also realized that many people support this Plan for many reasons but few really have taken the time read the plan. Once the Sonoran Desert Conservation Plan is opened up and exposed I think when election time comes some of our politicians will see it in an entirely different light

Cordially,



Charles E. Bristow

Cc: Sharon Bronson, Pima County Supervisor

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

After reading the draft of the Sonoran Desert Conservation Plan, that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interests of the taxpayers, ranchers or the wildlife.

The people that work and live on the ranch in the Sierrita Mountains have been very successful at improving the water and the grasses. Not only do the cattle benefit from their management program, the wildlife also benefit from the developed water sites and the grass that is planted. The salt and feed blocks are shared by the wildlife as well as the cattle. The pastures are not overgrazed and any disturbed ground is always reseeded.

A group of families began the McGee Ranch in 1895. They were headed for California when traveling difficulties slowed them and they decided to stay. Many descendants of these original families are currently living and working on the ranch.

When the forefathers began the ranch the wildlife was sparse, because there was little water. The management of the springs and building of many dams over the last one hundred and four years has increased wildlife so that even in drought years you see plenty.

The question is; Why now is there a need for the County's Conservation Plan?

The land is already being managed at no cost to the taxpayer and as well the county. The mountainous part of the ranch is under restricted auto access although open to hikers, bikers and equestrians. The lower part of the ranch is open for all access.

You are cordially invited to visit this community and see for yourself the need for a park does not exist in the Sierrita Mountains. The park that everyone is talking about is already there at no cost to the taxpayer. Please consider this:

THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

Elizabeth Espinoza
579 Avenida del Comercio
Tucson, AZ 85745

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

After reading the draft of the Sonoran Desert Conservation Plan, that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interests of the taxpayers, ranchers or the wildlife.

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Sincerely,

Sarah L. Baker
590 W. Hawk wy #1
Omaha, Oz.
85645

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

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Sincerely,

Wendell B. Babin
590 W. HACK WAY
AND A DO ARIZ.

55645

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

After reading the draft of the Sonoran Desert Conservation Plan, that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interests of the taxpayers, ranchers or the wildlife.

The people that work and live on the ranch in the Sierrita Mountains have been very successful at improving the water and the grasses. Not only do the cattle benefit from their management program, the wildlife also benefit from the developed water sites and the grass that is planted. The salt and feed blocks are shared by the wildlife as well as the cattle. The pastures are not overgrazed and any disturbed ground is always reseeded.

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THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

Wm. B. Vermeersch
3426 N. Lomero Rd #7
Tucson, Az 85705

C. H. Huckleberry:

I am writing this letter to oppose the "Sonoran Desert Park Plan"

I live on Mc Gee Ranch, which is at the base of the Sierrita Mountains, a big part of your "plan." I have lived here 54 years. I am part of the fourth generation. We have six generations who have lived here for over 100 yrs. Our families are honest law abiding citizens. We are raising our families to have good values & morals. There are 100 families in this place.

I never thought in my wildest dreams that the government would come in and try to take our land. It has been in the planning for 4 yrs without any knowledge on our part. We were not informed.

We have raised our families and have overlook this land with love, keeping it clean and preserving it for our heritage. If you come in and make a park of this place it will be destroyed by the public. There are people who come to hike, to ride, to bird watch, to hunt. So it's already a park, kept up by the people who live here. Not millions of tax dollars by the people of Pima County.

We are asking please to stop this plan. Let us run our land as we have for over a century. Where we can raise our children & grandchildren in peace, using the land around us.

Judith Murphy
Resident of Mc Gee Ranch

C.H. Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

To: M. M. M. —
see me on how
to account for
these form letters.

Dear Administrator Huckleberry:

After reading the draft of the Sonoran Desert Conservation Plan, that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interests of the taxpayers, ranchers or the wildlife.

CDP
1/12/99

The people that work and live on the ranch in the Sierrita Mountains have been very successful at improving the water and the grasses. Not only do the cattle benefit from their management program, the wildlife also benefit from the developed water sites and the grass that is planted. The salt and feed blocks are shared by the wildlife as well as the cattle. The pastures are not overgrazed and any disturbed ground is always reseeded.

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Sincerely,

Carlene Peck
2581 W. Royal Palm Ln.
Tucson, Ariz 85705

C.H. Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

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THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

Ann L. Davidson
5483 N. Whitethorn Pl.
Tucson, Arizona 85704

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

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THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

Edwin Bradford
1852 W Casuelle Rd
Tucson Az 85713

C.H.Huckleberry, County Administrator
130 W. Congress St. 11th Floor
Tucson, Ariz. 85701

Dear Administrator Huckleberry:

After reading the draft of the Sonoran Desert Conservation Plan, that was presented to the Pima County Board of Supervisors, I don't believe this to be in the best interests of the taxpayers, ranchers or the wildlife.

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THE RANCHER IS THE ENDANGERED SPECIES!

Sincerely,

Walter D. Matthews
3650 W. Fairwood Pl
Tucson, Ariz

Southern Lago del Oro Community

Mail: 7925 North Oracle Road, Number 331, Tucson, Arizona 85704

Telephone: 293-1020 Fax: 292-0525

January 12, 1999

Supervisor Sharon Bronson
Chair of Pima County Board of Supervisors
130 West Congress Street
11th Floor Administration Building
Tucson, AZ 85701

RE: Your vote to remove our community from the proposed designation of Mountain Park as shown on the first draft of the Sonoran Desert Conservation Plan, thereby retaining the community's private property status. County staff supports this action.

Dear Supervisor Bronson,

You have expressed your desire to help our 243 acre community which was established over 30 years ago. Your constituents and supporters live their lives here, and look forward to our futures here as well.

As you know, our community happened to be drawn in as a Mountain Park in the draft of the Sonoran Desert Conservation Plan presented to the Board on October 27, 1998. As you can imagine, this has been very stressful for many members of our community, and we are looking forward to closure on this matter soon.

Upon meeting with County Staff, it was discovered that the boundaries drawn were only preliminary in nature, and were to be viewed as one possible idea for a wildlife corridor along the Canada del Oro wash.

Due to the vastness of the Sonoran Desert Conservation Plan, County staff were unable to research the particulars of every locale in detail. They were not aware that the CDO wash in our community is already protected by four currently existing wildlife corridors, which join to form one large corridor of protection. Wildlife continuously moves freely through our community, and along the CDO wash unhampered.

On October 27, 1998 our community representatives attended the Board Meeting and made a presentation to the Board including this new essential information, and we requested that the Board remove the cross-hatching designation of Mountain Park from our private property.

The Board then asked Mr. Huckleberry to respond to our community's request.

Mr. Huckleberry answered stating that the objective of the County was wildlife corridor protection of the CDO wash. In his own words he said that the County was concerned "with the corridor protection of the Canada del Oro wash, and if there are other means to do that and retain their private property rights, and allow them to use their property, that is an appropriate action that we should follow."

COPT TO SUPERVISORS
COUNTY ADMINISTRATOR

DATE 1/15 19 99

At the end of the public meeting, you suggested our community follow the process and work with County staff, which we did. In all, we had 9 meetings with County staff and officials, and the documentation from those meetings is attached.

Our final meetings were with Mr. Dan Felix, Director of Parks and Recreation who expressed his support for our community, as well. He stated that he "supports the removal of the cross-hatching designation of Mountain Park," and that "the CDO wash itself is an existing wildlife corridor that the County recognizes...already protected through Zoning and Floodplain Restrictions."

Mr. Felix also said he "recognized our community's private property rights and preexisting holdings that need to be honored. There is not an overwhelming public purpose for usage of your land, and that the County has alternatives available to the east and west of your community on State Trust lands. It does not make sense to pursue purchasing private property when taxpayer's money can be better spent in the acquisition of State Trust lands primarily."

Supervisor Bronson, based upon the views and statements of support our community has received from both Mr. Huckleberry and Mr. Felix, the goal of wildlife corridor protection in the CDO wash has been achieved in our case, and therefore, the Mountain Park cross-hatching designation can be removed.

We request your assistance in having this placed on the Board Agenda, and your vote in support of this measure.

Action Requested

We ask you, as a member of the Board of Supervisors, to request that the County Administrator prepare a Resolution to be placed on the Board Agenda. This Resolution would leave our Southern Lago del Oro community, south of Rollins Road in Catalina, in its existing private property status by removing the proposed Mountain Park designation from our boundaries. Perhaps this Resolution might be considered by you and the rest of the Board at the same time Mr. Huckleberry presents his report and recommendations to the Board on public comment.

Our community thanks you for all that you have done to help us. Working with and through the process can accomplish good when all parties work together.

Please reply to our community's letter at your earliest convenience. Thank you.

Sincerely,



Charles M. Award, M.B.A.

Southern Lago del Oro Community Liaison to Pima County

cc: Supervisor Boyd
Supervisor Carroll
Supervisor Eckstrom
Supervisor Grijalva

Clerk of the Board
Mr. Chuck Huckleberry
Mr. Dan Felix

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- 5) Wildlife Corridors now in place along the CDO wash through the Southern Lago del Oro Community South of Rollins Road
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CHRONOLOGY

- October 26, 1998 Supervisor Bronson meets with delegation from Southern Lago Del Oro Community regarding the proposed mountain park designation placed on our community.
- October 26, 1998 Supervisor Grijalva meets with delegation from Southern Lago Del Oro Community regarding the proposed mountain park designation placed on our community.
- October 26, 1998 County Administrator's staff person Ms. Maeveen Behan meets with delegation from Southern Lago Del Oro Community regarding the proposed mountain park designation placed on our community.
- October 27, 1998 Charles Award, on behalf of Southern Lago del Oro community, gives presentation to Board of Supervisors at Public Meeting requesting that the proposed mountain park designation be removed from our community.
- October 27, 1998 County Administrator Chuck Huckleberry responds at public meeting to community's concerns.
- November 9, 1998 County Administrator's staff person Ms. Maeveen Behan meets with delegation from Southern Lago Del Oro Community regarding the proposed mountain park designation placed on our community.
- December 11, 1998 Pima County Floodplain Staff meeting takes place. FEMA maps are reviewed, and provided to community.
- December 15, 1998 Pima County Zoning Staff meeting takes place. Zoning maps are reviewed, and provided to community.
- December 17, 1998 County Administrator's staff person Ms. Maeveen Behan makes public presentation at Asarco Building about the proposed Sonoran Desert Conservation Plan. Delegation from our community attends.
- January 5, 1999 Parks and Recreation Director Dan Felix meeting takes place regarding their decision to support our community and remove the proposed mountain park designation.
- January 12, 1999 Parks and Recreation Director Dan Felix meeting takes place regarding their decision to support our community and remove the proposed mountain park designation.

SOUTHERN LAGO DEL ORO PARKWAY COMMUNITY

ANDERSON, DAVID & MARTHA
AWARD, CHARLES & GAIL
BRANCH, ROBERT & JANET
BROWNING, WILLIAM & ZERILDA
CLARK, LINDA & KEEFER, MARILYN
CLEMENTS, VIRGINIA
CLOUGHERTY, ANTHONY
CLOUGHERTY, ANTHONY & TERESA
COLUSSY, MICHAEL & ANDREA
GOEBEL, GARTH, COLUSSY, MICHAEL & GIPSON, KATHERINE
DE VORE, GLORIA
ESKE, WYMAN
FORD, GARRETT & LISA
FRASE, LARRY & MARIA & ALLEGRA, MICHAEL & MARILYN
HAN, ELIZABETH
HIRSCH, VICTOR
HOTSON, WILLIAM & CAROLYN
HURLEY, HAROLD & JANICE
K.D.K. NATIONAL INC.
KILGORE, NANCY
KOUDELKA, DENNIS & VICTORIA
LA PLANTE, DORLY
LOHMAN, RONALD
LOREY, RODERICK
MANN, BRENT & MICHELLE
MANN, JAMES & CAROL
MANN, MAURICE & CAROLE
McDONALD, COLLEEN
McDONALD, JOHN & MARY
McDONALD, RICHARD
O'BRIEN, MARK
OLKER, DONALD & THERESE
PERKINS, JAMES & MARY
PIRIANO, LOUIS & EVELYN
POYAS, DONALD & ANITA
REECE, DAVID & CAROL
RIEFFEL, DONALD
RIEFFEL, DONALD & HOTSON, WILLIAM & CAROLYN
SCHICK, MILTON
SHOLIN, DAVID & NAKAI, RUMIKO
VINSON, JUDITH

PRESENTATION TO BOARD OF SUPERVISORS
PUBLIC MEETING - SONORAN DESERT CONSERVATION PLAN
OCTOBER 27, 1998

PRESENTED BY:

CHARLES AWARD, M.B.A

SOUTHERN LAGO DEL ORO COMMUNITY LIAISON TO PIMA COUNTY

Good morning Board Members and Mr. Huckleberry.

We are here on behalf of the Homeowners of the Southern Lago Del Oro Neighborhood in South Catalina. Over the weekend, a large group of us met to express our concerns about the Sonoran Desert Conservation Plan.

Some Background ...

We are a community of property owners that have been in existence for nearly 30 years. We have retired homeowners, families with children, professional people, etc., in our community. This is where people live their lives, and want to continue living.

We would like to be able to support the Sonoran Desert Conservation Plan. However, there is a correction that needs to be made in our area for us to be able to give our support.

Would the Board please turn to Figure 16 - Catalina State Park Extension. You will notice there are three neighborhoods in this same vicinity ...

- (1) The Mountaineer Neighborhood,
- (2) Our Southern Lago del Oro Neighborhood, and
- (3) The Golder Ranch Neighborhood.

You will notice that our neighborhood is cross-hatched as a mountain park while the other two are not. Our goal is to remove the cross-hatching designation of mountain park from our private property neighborhood and for the mountain park designation to be placed more appropriately on the State Trust land where it is vacant land and it will not disrupt or impact a neighborhood community.

This area over here would be more appropriate for a mountain park and people's homes and lives would not be disrupted.

Our neighborhood's private property would cost approximately \$5 million, while State Trust land in the same area would cost a mere fraction of that amount and would not impact a residential community. Why would we waste needed taxpayers' money in this fashion.

Yesterday a delegation of our community met with Mr. Huckleberry's staff and we determined that we have mutual goals of protecting wildlife.

Due to the preliminary nature of this proposal for our area, County Staff were not aware that current zoning restrictions and floodplain requirements already in place at this time do indeed adequately protect wildlife. Most of our community is zoned one

house to 4.3 acres and floodplain regulations restrict all use of the floodway, as well as requiring a 500-foot setback from the wash. These facts give wildlife in the area the full access corridor they need to exist and flourish.

Our neighbors to the east in the Golder Ranch Neighborhood have virtually the same habitat as our neighborhood. In fact, they have two washes rather than one wash like us, yet they were not designated a mountain park. We feel that this is unequal and should be corrected.

In summary, we request that the Board order the removal of the cross-hatching designation from our neighborhood, and return it to private property status so that we can sleep at night and support this wonderful plan for protecting and preserving our desert environment.

Thank you.

Charles Award, M.B.A.

Southern Lago del Oro Community Liaison to Pima County

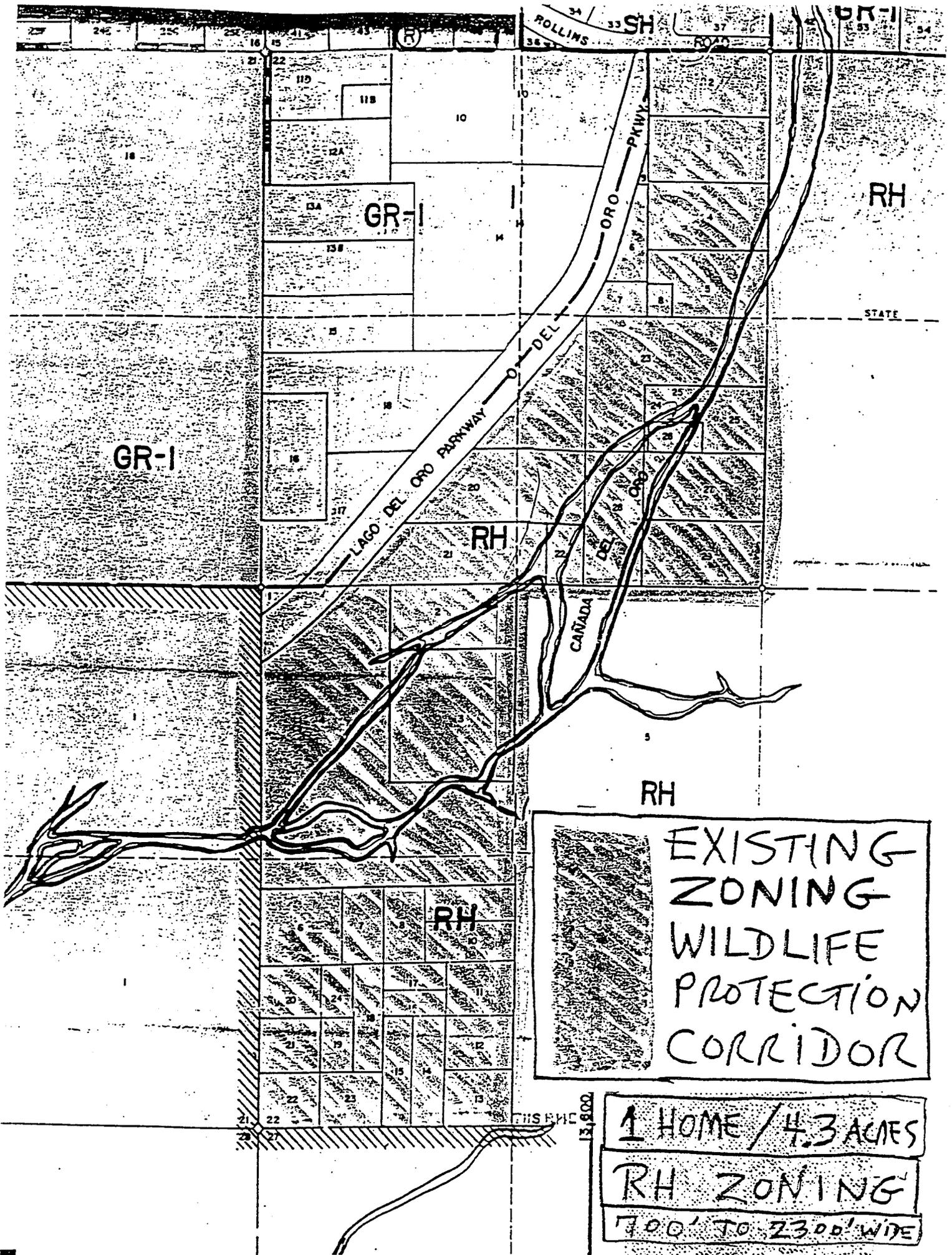
October 27, 1998

County Administrator's Response to Southern Lago del Oro Community
Text from minutes of Board Meeting--October 27, 1998

Charles Award: Finishes speaking (see previous pages for text of presentation)

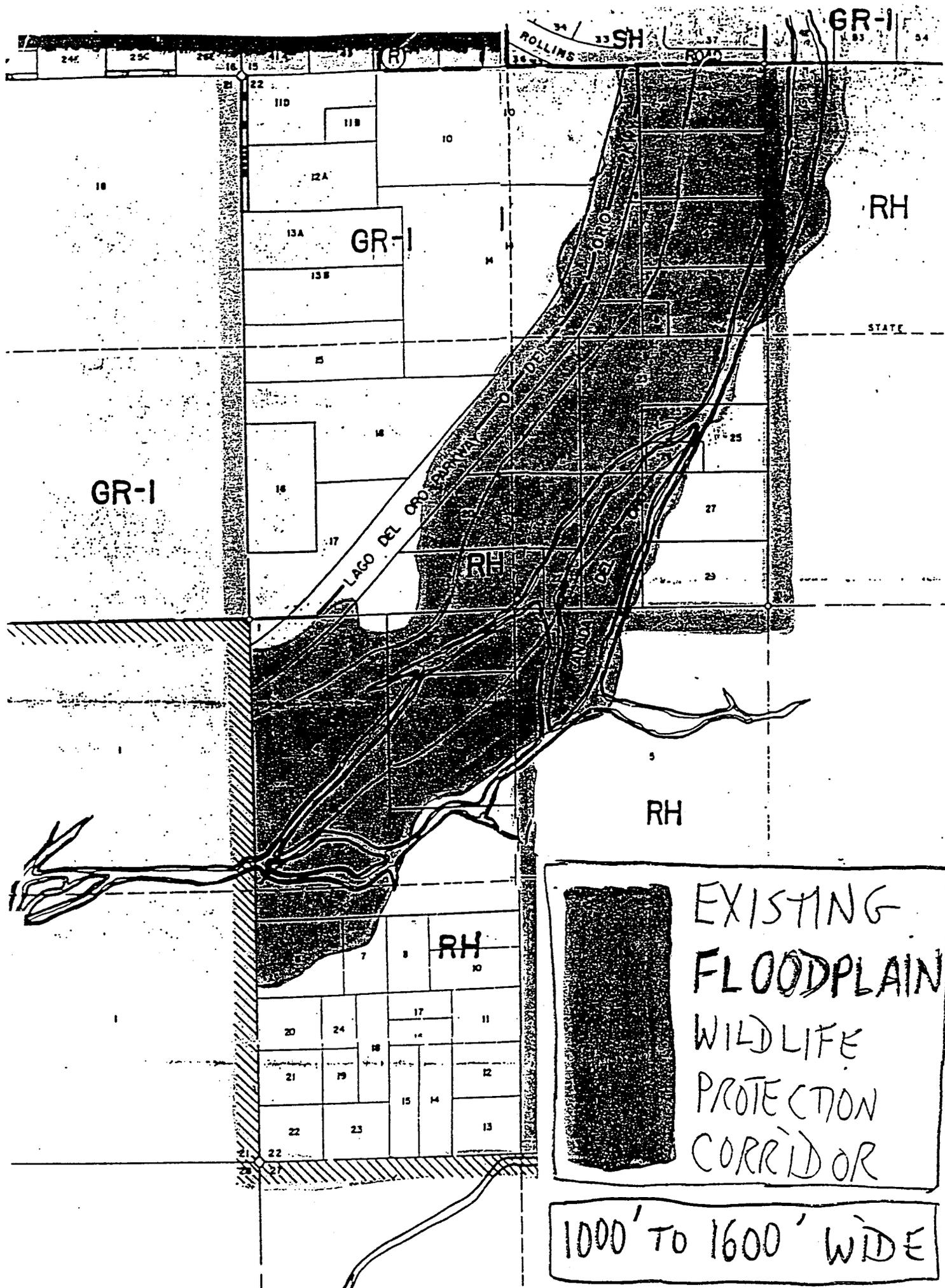
Chairman Boyd: "Mr. Huckleberry...can you comment on any of that ?

Mr. Huckleberry: "Mr. Chairman...that's the purpose of public review and comment...is to obtain information that would indicate to the staff that we should in fact modify the maps...which should be taken into consideration, the only....again...the staff who worked on this particular element was concerned mostly with the corridor protection of the Canada del Oro wash, and if there are other means to do that and retain their private property rights, and allow them to use their property, that is an appropriate action that we should follow."



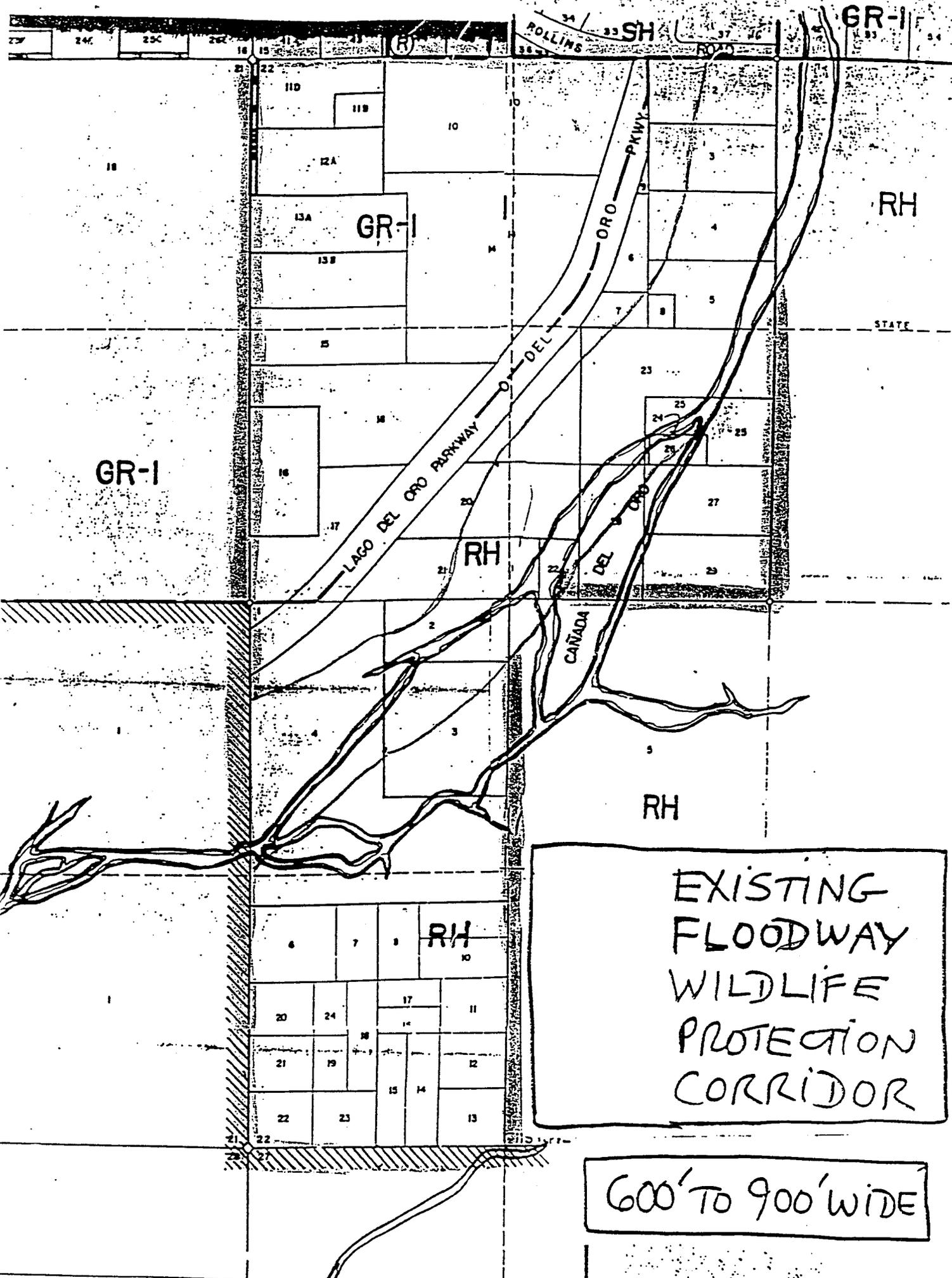
EXISTING
ZONING
WILDLIFE
PROTECTION
CORRIDOR

1 HOME / 4.3 ACRES
RH ZONING
700' TO 2300' WIDE



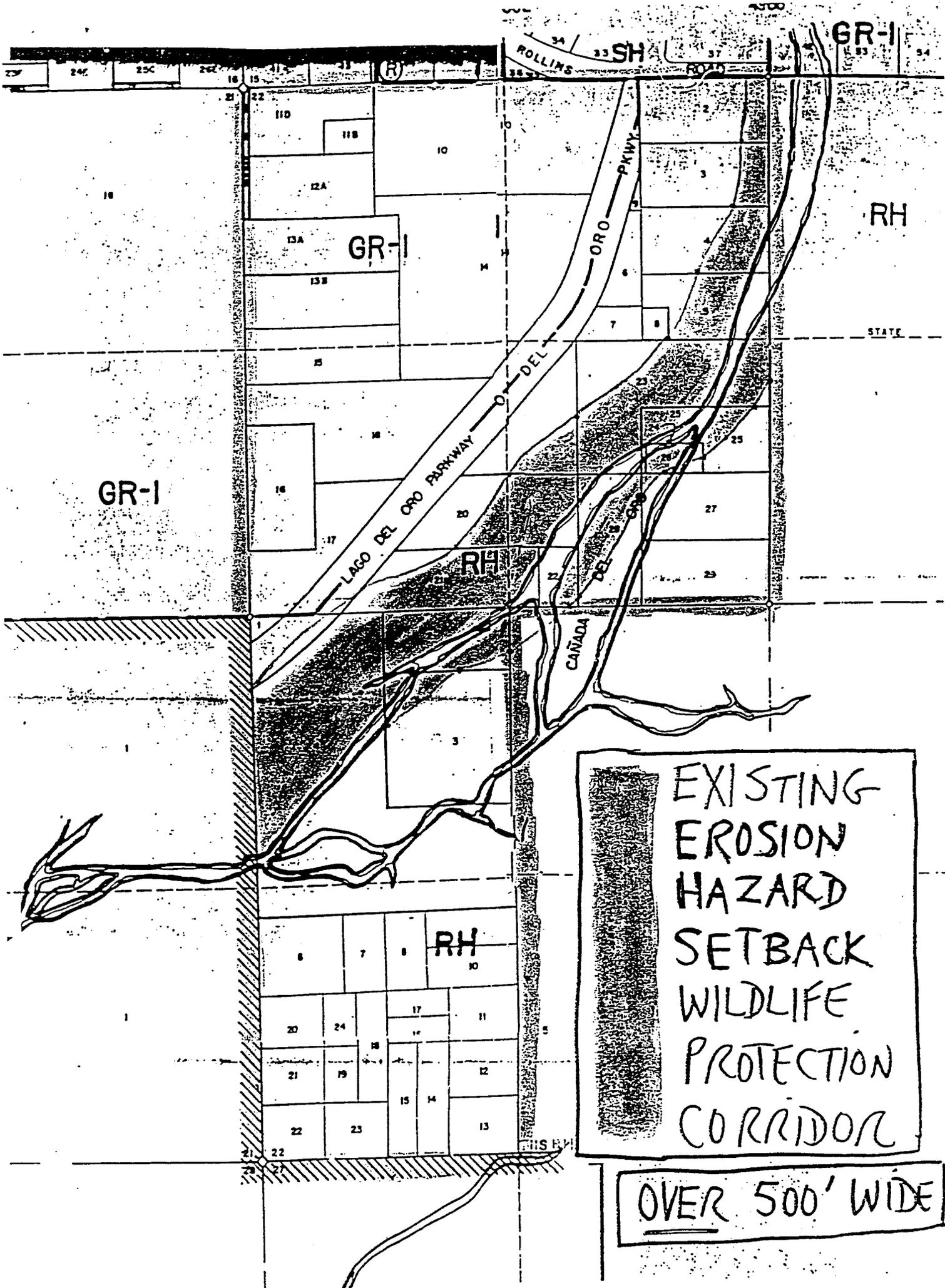
EXISTING
 FLOODPLAIN
 WILDLIFE
 PROTECTION
 CORRIDOR

1000' TO 1600' WIDE



EXISTING
FLOODWAY
WILDLIFE
PROTECTION
CORRIDOR

600' TO 900' WIDE



GR-1

GR-1

RH

STATE

LAGO DEL ORO BACKWAY

ORO PKWY

CANADA DEL ORO

RH

EXISTING
EROSION
HAZARD
SETBACK
WILDLIFE
PROTECTION
CORRIDOR

OVER 500' WIDE

Coalition for the Sonoran Desert Protection Plan

300 E. University, Suite 120, Tucson, Arizona 85705 phone/fax: (520) 629-0525 email: cac@azstarnet.com

Arizona Center for Law in the Public Interest / Arizona League of Conservation Voters / Arizona Native Plant Society / Alliance Marana / Buffers / Center for Environmental Ethics / Center for Environmental Connections / Defenders of Wildlife / Desert Watch / Drylands Institute / Environmental and Cultural Conservation Organization / Friends of Cabeza Prieta / Human Ecology Action League / Neighborhood Coalition of Greater Tucson / Northern Tucson Mountains Resource Conservation-Education Project / Northwest Coalition for Responsible Development / Oro Valley Neighborhood Coalition / Pima Farms-Scenic Drive Neighborhood Association / Pima-Pinal Trails Advisory Committee / Protect Land and Neighborhoods / Saguaro Forest Associates / Save the Scenic Santa Ritas / Sierra Club / Silverbell Mountain Alliance / Sky Island Alliance / Sky Island Watch / Society for Ecological Restoration-UofA / Sonoran Arthropod Studies Institute / Southwest Center for Biological Diversity / Southwest Tucson Environmental Alliance / Student Environmental Action Coalition-SW / Tucson Audubon Society / Tucson Herpetological Society / Tucson Mountains Association / Tucson Solar Alliance / Wildlands Project / Wildlife Damage Review / Women for Sustainable Technologies

January 13, 1999

Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

Re: Sonoran Desert Conservation Plan, MSCP Steering Committee

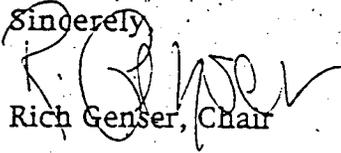
Dear Mr. Huckelberry:

As you are aware, the Coalition for the Sonoran Desert Protection Plan (CSDPP) is very interested in Pima County's multi-species habitat conservation planning process. Indeed, our Coalition was formed for precisely the purpose of guiding this process toward real protection of endangered and other target species, while providing a blueprint for future urban growth.

Many of our member organizations are requesting representation on the Steering Committee that is now being formed within this process. As well, we would like to request that Carolyn Campbell, the Coalition Director, be included on the committee.

Thank you for your consideration. Please contact me at 529-4899 if you have any questions or need more information. Or feel free to call Carolyn Campbell at the CSDPP office at 629-0525.

Sincerely,


Rich Genser, Chair

cc: Pima County Board of Supervisors

January 13, 1999

Mr. Chuck Huckelberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701

RE: Sonoran Desert Conservation Plan, MSHCP Steering Committee

Dear Mr. Huckelberry,

It is our understanding that you are now in the process of establishing a Steering committee to coordinate development of a regional Pima County multiple species habitat conservation plan. With this letter, we wish to convey interest by the Northwest Coalition for Responsible Development in the formal participation on this Steering Committee.

The Northwest Coalition for Responsible Development representatives to the MSHCP Steering Committee are Joe Murray and Carol Duffner. We can be reached at 742-6721 (Joe Murray) and 744-6880 (Carol Duffner) if you have any questions regarding this letter. Thank you for your consideration.

Sincerely,

Carol Duffner

Carol Duffner
Secretary, Northwest Coalition for Responsible Development

cc: Pima County Board of Supervisors

Gene I. & Marvyl M. Wendt
WRONG MOUNTAIN WILDLIFE PRESERVE
18000 E. Papago Springs Rd.
PO Box 326
Vail, AZ. 85641-0326
520/647-7538



13 January 1999

PIMA COUNTY ADMINISTRATORS OFFICE
130 W. Congress, 10th Floor, SDCP
Tucson, AZ. 85701

Re: Sonoran Desert Conservation Plan

Congratulations:

On the outstanding efforts in drafting a plan to promote the preservation of at least a portion of the beauty of the Sonoran Desert and link the riparian areas to the surrounding mountain ranges.

The Rincon Valley is the "Last Great Place" in the Tucson basin and we urge you to hasten preservation of the remainder of the Rincon Valley that would include:

1. The preservation of all remaining state land as open space.
2. The rapid expansion of Colossal Cave Mountain park to the area outlined in the plan in an effort to forestall the dozers from destroying additional desert & foothills on remaining private lands within the proposed park boundary. (e.g. the latest destruction of the SW1/4S33T15SR17E)
3. NO UP-ZONING of private land that is currently in, adjacent to or within 1/2 mile of any proposed open space or park areas.
4. Prohibit construction of any RV park within the valley boundary whether overnitters or long term. There is adequate area along I-10 for this type of business.

Thank you for the opportunity to comment on your proposed conservation plan.

Sincerely,

A handwritten signature in cursive script that reads "Gene I. Wendt".

Gene I. Wendt

A handwritten signature in cursive script that reads "Marvyl M. Wendt".

Marvyl M. Wendt

GIW/giw
Env/Pimcty/SDCP/011399

RECYCLED



Deanna Kinsey
Carol Ehrlich
625 N. Van Buren # 112
Tucson, AZ 85711
January 13, 1999

Chuck Huckelberry
Pima County Administrator
130 W. Congress
Tucson, AZ 85701

Dear Mr. Huckelberry,

We are very encouraged by the Board of Supervisors
"NO" vote on Caneva Ranch rezoning.

We are writing to let you know that we are very
much in favor of your Sonoran Desert Conservation
Plan being approved and implemented as soon
as possible. It is very clear to us that this is
the right time to do this. There is still the chance
that Tucson and Pima County can say "no" to
more urban sprawl and environmental
destruction and "yes" to this excellent desert
conservation plan.

The time is right; there may not be another
chance. So to all involved, have courage
and foresight to approve and implement
the Sonoran Desert Conservation Plan!

Sincerely,
Dee Kinsey & Carol Ehrlich

Written at the time of visiting my mother, Adina Medema (McGee)

Jan. 13, 1999

Officers of Pima County, State of Arizona, and Federal Governments:

Re: Protest Against Sierrita Mountain Land Violation of Residents Rights.

I am part of the large McGee family who has lived in the Sierrita Mountains for six generations; I was born in Tucson and grew up on the McGee Ranch which was homesteaded and founded before Arizona was even a state of the U.S.A. My mother was the tenth child of James Riley McGee by Zinah Bingham, and still lives at the McGee Ranch today. Others in our community have written similar letters and are trying to protest, like myself, against the takeover of the Sierrita Mountains by federal, state and county agencies who presume that this area needs to be managed by government so that it does not get exploited or ruined. I want to join in this protest because this land does not need any more government management than it already has.

The Sierrita Mining and Ranching Company and many related families have lived on and maintained this mountain land continuously and done a good job for all of the hundreds of relatives of the original pioneers who still hark back to this piece of earth and regard it as their historical, spiritual, as well as physical homebase. These residents have been mindful of the environmental balance, have been fair with any visitors who wish to hike, hunt, picnic, camp, etc. even when visitors have shot cows mistaking them for deer, left garbage, gotten themselves stuck in arroyos and necessitated rescue. It is a shock to be told that the Sierrita Mts. will be taken from our care without us being properly informed, much less consulted. There seems to be no element of fairness, really, in being invited to "form a coalition" or nominate interested parties for "a steering committee" as the Pima County representative has suggested, because such actions, though constructive from the view of the governmental agencies, actually admit to acceptance of these government plans for our land. Not only do these residents object to the land management being usurped, we also object to the implication that the land can or would be sold. Certainly Sierrita Mining and Ranching Company has clearly stated in public and letters, that they have no intention of selling any land. Right of Public Domain is unjustified.

Sincerely,



Sharon L. Conine (Medema-McGee) P. O. Box 3154, Amherst, MA. 01004

January 13, 1999

Dear Sirs,

I am writing this letter in opposition of the McGee Ranch Park. I was shocked when I read in the newspaper that my family's ranch was considered for a park. First off, the landowners were not given due process by reading it in a newspaper.

I am the third generation of the McGee family. I grew up on this ranch and am now 27 years old. I, my wife and our three children just remodeled our home and now I am finding out that you are going to construct the park right through my home. This is not right.

My grandfather, Chad McGee, passed on to us how his father, J. McGee founded the property, harvested the land and preserved it. There is a lot of history here. My grandfather founded and developed the Sierrita Mining and Ranching Co. His intent was to have the family work the land through cattle ranching and construction. Many families here work for this company to support their families and they also take great pride in our ranch. They are passing down to their kids what our ancestors intent was, along with the morals and values that society today doesn't seem to acknowledge.

My grandfather told me to raise my children up here, there was no better place. He was right. We lived in Tucson for a while, the kids grades were poor and were more concerned with violence and gangs than with morals, values and school. My wife and I took a cut in pay to live here, for the sake of a great environment for our kids. Now they are honor roll students. They are in a 4-H club, taking on the responsibility of raising market hogs. They also do community volunteer work with their club. I am passing down to them my family's history and they are learning to take care of our land, how to garden and many more responsibilities that many children these days don't have. Most of all they learning morals and values and responsibility and being a family. are

There are more than 100 families living here all with the same goal; to go back to the basics of life and raise their children to become well rounded educated adults. We take great pride in preserving our land. If there were a park here it would destroy the preservation of this land.

The public is already invited to go through the gates at the top of the ranch and hike and sight-see. Why must there be a park?

McGee Ranch is a cattle ranch where the decedents of the McGees' and Harris' are up keeping the land and raising their families. We value what we have and what has been passed down to us and are not willing to give any of it up. We urge you to reconsider.

Sincerely,



Ernest Burnham
Great grandson of J. Mc Gee

cc:

Attorney General Grant Woods.

Senator John McCain

Senator John Kyl

Jim Kolbe, Congressional Rep. District 5

Ed Pastor, Congressional Rep. District 2

C.H. Huckleberry, County Administrator

Mike Boyd, Pima County Supervisor, District 1

Dan Eckstrom, District 2

Sharon Bronson, District 3

Raul Grijalva, District 5

Green Valley News

Govenor Jane Dee Hull

The
Nature 
Conservancy
Arizona Chapter

TUCSON OFFICE:
300 East University Blvd., Suite 230
Tucson, Arizona 85705
(520) 622-3861 Fax (520) 620-1799

PHOENIX OFFICE:
5308 North 12th Street, Suite 402
Phoenix, Arizona 85014
(602) 264-4665 Fax (602) 264-4960

LESLIE N. COREY, JR.
Vice President & Executive Director

January 14, 1999

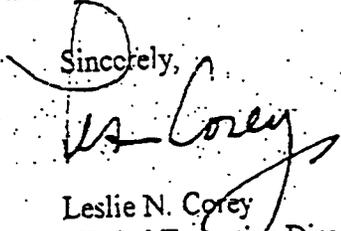
Mr. Chuck Huckleberry
Pima County Manager
Pima County Administrator's Office
130 S. Congress Avenue
Tucson, AZ 85701

Dear Mr. Huckleberry:

The Arizona Chapter of The Nature Conservancy is interested in participating as a member of the Steering Committee for the Pima County Sonoran Desert Conservation Plan. This is a bold and historic conservation effort for Pima County and we applaud the leadership that you and the Pima County Board of Supervisors have taken in this regard. We look forward to working with you and your staff to assist the County's efforts.

I look forward to hearing from you.

Sincerely,


Leslie N. Corey
VP and Executive Director

cc. Margaret Madden, Chair, Board of Trustees, Arizona Chapter

Vicki L. Cox Golder

3415 E. Golder Ranch Road
Tucson, Arizona 85739

Phone 520-825-3922
Fax 825-3977

January 14, 1999

Chuck Huckleberry
County Administrator
130 W. Congress
Tucson, Arizona 85701

Dear Mr. Huckleberry,

I am writing to submit my name for consideration on the Sonoran Desert Protection Plan Committee. I and my family have a vested interest in this plan and I feel I am qualified to serve.

The plan calls for the expansion of the Catalina State Park. That expansion would greatly impact our cattle grazing operation. That expansion would also greatly effect surrounding property owners. I believe I have some solutions to these problems that could benefit everyone involved. With every park expansion, you will encounter these same concerns, so any solutions would also benefit everyone in the county.

I hope you will seriously consider my appointment. I will do my best to be constructive in trying to help you meet your goals while at the same time addressing the many obstacles that this plan presents.

Sincerely,



Vicki L. Cox Golder



Cougar

Silverbell Mountain Alliance

13457 North Red Hill Road • Marana, Arizona 85653

Phone/FAX: 520-682-6182



Pygmy Owl

Jan. 14, 1999

To: Office of Chuck Huckelberry
(Re: Steering Committee)

I am Guy Kirkpatrick, vice-president of Silverbell Mtn. Alliance. I am a pen and ink wildlife artist, a family man and property owner of remote and rare lands in Arizona and New Mexico.

I have been involved in the rehabilitation and re-introduction of many endangered species in the southwest, especially the raptors. My family and I have built an elaborate natural riparian sanctuary in two beautiful areas of the southwest. We have observed an ever increasing need for responsible human interaction in order to maintain the precious balance of all the threatened species of life; especially regarding the systematic, insensitive invasion of our natural habitats and corridors.

I hope I can be of some service as a member of this committee and cause.

Sincerely,

Zephaniah Guy Kirkpatrick

Personal Mailing Address:

P.O. Box - 71324

Tucson, AZ. 85703

Telephone # (520) - 682 - 6137



Bighorn Sheep



10,000 year old Hohokam Ceremonial Site



Jaguar

Quinn Simpson
Center for Environmental Ethics
6550 West Sunset Road
Tucson, Arizona 85743

Jan. 14, 1999

Chuck Huckleberry
Pima County Administrator
Pima County Administration
130 West Congress
10th Floor
Tucson, Arizona 85701

Re: Sonoran Desert Conservation Plan

Dear Mr. Huckleberry,

Please accept my request to assist in the planning process of the Sonoran Desert Conservation Plan, particularly its MSCP component. I am a willing and able representative of the Center for Environmental Ethics and am requesting a seat on the Steering Committee which will act to formulate decisions pertaining to your Conservation Plan.

If I might supply you with information regarding my credentials or my qualifications to serve on such a Committee, please do not hesitate to contact me.

Sincerely,

Quinn Simpson
Director, Center for Environmental Ethics
Tucson, Arizona

cc: Supervisor Raul Grijalva
Pima County Supervisor



United States Department of the Interior

NATIONAL PARK SERVICE
Saguaro National Park
3693 South Old Spanish Trail
Tucson, Arizona 85730

IN REPLY REFER TO:

D18 (SAGU-SUPT)

January 15, 1999

Mr. Chuck Huckleberry
Pima County Administrator
130 W. Congress, 10th Floor
Tucson, AZ 85701-1317

Dear Mr. Huckleberry:

First, we want to congratulate you on your leadership in developing an exceptional and progressive integrated plan to identify important conservation parcels and to develop strategies for their protection. The fact that this effort has come so far with such strong and diverse support is remarkable. I wanted to particularly recognize the outstanding job your special assistant, Maveen Behan, has done in bringing everyone to the table and effectively establishing consensus.

There are many positive aspects to this conceptual plan. By combining six elements into an integrated whole, you envision a system of protected areas that is much greater than the sum of its parts. The strategies outlined in the plan, when implemented, will be extremely beneficial in protecting Saguaro National Park and will establish Pima County as a leader in comprehensive community-based conservation. Just as Saguaro National Park cannot maintain ecosystem integrity/viability without interconnecting protected areas, Pima County cannot reach your goals without integrating with your neighbors. In fact, this may well serve as a national model for other counties facing similar situations.

Generally, I found that the presentation of the material in the plan was well organized and thoughtful. The objectives were clear and comprehensive and most of my questions were answered in the document. My specific comments will focus on areas that are most closely connected with the east and west units of Saguaro National Park.

1. We are particularly interested in maintaining biological and riparian corridors that link various protected areas, thus reducing habitat fragmentation. We also want to reduce the potential for the invasion of non-native species, primarily fire-prone plants and aggressive amphibians like bullfrogs.

2. In the Rincon Mountain District (Saguaro East), we endorse the concept of the entire length of Rincon Creek, from where it exits the park boundary to its junction with Pantano Wash, to be identified as a biological corridor (fig. 24). However, Rincon Creek is not

accurately represented in Figure 24. Midway through the Rincon Valley, Coyote Creek, a tributary of Rincon Creek is highlighted, instead of Rincon Creek proper, which continues northeast into the park (not that Coyote Creek may not merit designation/protection as well.) The upper end of this streambed crosses private land and has key water features where native frogs still breed. Similar designations for Rincon Creek tributaries, Chimenea and Madrona Creeks, would help protect sections of these streams that cross private lands. The Rincon Creek restoration projects mentioned on p. 16 are very important for improving the biological integrity of the Rincon watershed. We support the Rincon Institute's proposal to expand Colossal Cave Mountain Park even more by adding more adjacent state lands than currently shown in the plan.

3. On the north side of the Rincon Mountain District we would like for you to consider including the small sliver of land between the park boundary and Tanque Verde Creek as part of a biological corridor linking the park with the wash. The potential for more dense development in the area would seriously degrade migration routes for park wildlife that leave the park and use the riparian corridors such as Tanque Verde Creek. Furthermore, protecting riparian habitat within the Tanque Verde creek bed from where it exits National Forest land to where it joins Agua Caliente is important for wildlife movement. If possible, protection should extend to its juncture with Sabino Creek or Pantano Wash.

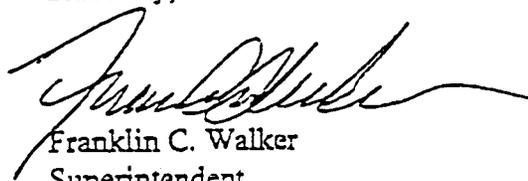
4. The Tucson Mountains are a relatively small range and maintaining connections between them and other nearby ranges is exceedingly important for maintaining viable wildlife populations. Linkages between the Tucson and Santa Catalina Mountains have been compromised beyond restoration, but protecting corridors to the west may still be accomplished. Additional scientific studies would be needed to determine the significance of these corridors. Designation and protection of the Waterman-Roskrue Mountain Park and protection of the Tucson Mountain West Biological Corridor, shown with cross hatches on figure 14 are essential projects for maintaining these important linkages. There may also be some remnant corridors on the east side of the Tucson Mountain District that have not been identified in your draft.

5. Some of the figures do not portray Saguaro National Park's boundary accurately. Specifically, figures 1, 2, 5, 6, 12, 14 and 22 do not include the expansion areas that were added to both districts in the 1990's. Figure 3 seems to show the boundaries accurately, except for the extreme southeast corner of the Tucson Mountain District, where some additional areas should be included inside the boundary. Figure 3 seems to illustrate state-owned within the park boundary accurately; however, it would benefit from a more comprehensive legend. Figure 4 uses the same boundary, but shows some private land (white) within the boundary in areas that are all federal ownership. Current boundary maps for Saguaro National Park will be sent separately.

Finally, I would like to offer Saguaro National Park's wildlife biologist, Natasha Kline, as a possible member of the technical committee assigned to develop the multi-species habitat conservation plan and biological assessment. I would also volunteer to serve on the overall steering committee.

Best of luck with a remarkable and courageous plan!

Sincerely,

A handwritten signature in cursive script, appearing to read "Franklin C. Walker". The signature is written in dark ink and is positioned above the printed name and title.

Franklin C. Walker
Superintendent

Altar Valley Conservation Alliance

c/o Pat King, Anvil Ranch, HC 1 Box 97E, Tucson, AZ 85736 (520) 822-1065
c/o Mary Miller, Elkhorn Ranch, HC 1 Box 97, Tucson, AZ 85736 (520) 822-1040

January 15, 1999

Mr. C.H. Huckelberry, County Administrator (by Fax and Mail)
Pima County Public Works Center
130 West Congress 10th Floor
Tucson, AZ 85701
Ph (520) 740-8751
Fax (520) 740-8171

Regarding: Comments on *Sonoran Desert Conservation Plan*

Dear Mr. Huckelberry:

The purpose of this letter is to introduce you to our organization, the Altar Valley Conservation Alliance, comment on the draft *Sonoran Desert Conservation Plan*, and propose members of our organization who would like to participate in further development of the *Sonoran Desert Conservation Plan*. We had the opportunity to begin learning about this effort last month when Maeveen Behan and Linda Mayro spent the afternoon with us. During our session with them, members of our organization expressed interest in working with you, particularly on the portions of the *Sonoran Desert Conservation Plan* applicable to the Altar Valley. We look forward to having Maeveen and perhaps others from your staff attend our next meeting on Sunday February 7, 1999 at the Anvil Ranch to begin this effort.

Before we provide our comments, we would like to introduce ourselves to you. We are a group of ranch families and citizens committed to stewardship of the Altar Valley where we live and work. A handful of folks began working together as the Altar Valley Conservation Alliance in September 1995. Since then, our group has grown to include most of the Altar Valley ranches, several private citizens from the communities of Robles Junction and Arivaca, and numerous representatives from local, State and federal government agencies (please see the attached mailing list). Our vision follows:

The Altar Valley Conservation Alliance has a vision for stewardship of the Altar Valley watershed for the next 50 years. First, open space should be maintained and enhanced, while respecting private property rights. Second, economically productive use of the valley lands, both private and public, should continue. Third, management efforts should accelerate the rate of improvement of the Altar Valley watershed. Fourth, Western cultural values and the historic ranching communities of the Altar Valley watershed should be preserved. These elements of our vision are interwoven -- none can be achieved independently, nor can they be achieved without cooperation between all land stewards within the Valley. This vision will guide Alliance projects and efforts to work cooperatively with public and State land managers and others who have a stake in the future of the Altar Valley watershed.

Currently we are working on a watershed resource assessment project, funded by the State of Arizona Watershed Protection Fund. We are compiling historical and current stewardship data for the Altar Valley watershed and will use this information to create an action plan for future stewardship projects. We have developed and continue to maintain a prescribed natural fire management map for the watershed, and have made significant progress on transferring this data into a Geographic Information System database. We support each other and share information about other situations as the need arises, ranging from the various lawsuits affecting US Bureau of Land Management and Forest Service grazing allotments to State grazing lease issues to endangered species challenges. We have also actively opposed transfer of Baboquivari Peak Wilderness to the Tohono O'odham Nation and have encouraged the US Bureau of Land Management to initiate cooperative management planning for this area to resolve concerns and keep the area accessible to all people. In general, we strongly believe that ranching and conservation are ideal partners. We strive to act upon our beliefs and seek every opportunity to spread the word about the positive role ranching plays in preserving open space and habitat, maintaining open lands for public use and economic activity, and building healthy productive communities.

We will now provide our comments on the *Sonoran Desert Conservation Plan* (the Plan). We will begin with some general observations and then become more specific. As should be clear from our vision, we are enthusiastic about the idea of open space protection. The Plan's recognition of ranches as part of the conservation solution is truly refreshing and encouraging, and we are pleased to see the Altar Valley highlighted as an area worthy of preservation and protection. Ranching is certainly affected by many endangered species situations, so the notion of resolving endangered species conflicts regionally is appealing. At the same time, as ranchers we are admittedly wary of the potential for additional government control. When we first saw the Plan on December 7, 1998, we were defensive and somewhat offended to find the Altar Valley and our ranches highlighted in what looked like a rather slick finished product when we had never been consulted. At our December meeting, Maeveen and Linda assured us that the process has barely begun and that the County does indeed want us to help create this plan. And so at this point, we find our opinion of the Plan to be a mixed bag of curiosity, hope and concern. We do not intend to take a defensive stance. Rather we would like to be involved to assure that the Plan helps us achieve our vision for the Altar Valley.

From here on, our comments will be more specific.

1) Regarding urban expansion (pp. 1-3). We share the Plan's concern about urban expansion. We are keenly aware of the pressure of growth southwest of Tucson and in the Robles Junction area. Many ranches have already been purchased for development, resulting in permanent change to the productive agricultural capabilities and open space character of the Altar Valley. We are keen to avoid having additional Altar Valley ranch land head this direction.

2) Regarding the importance of State Trust land (pp. 4-5). The Plan points out the importance of State Trust lands in protecting Pima County open space. Here in the Altar Valley, our future is closely tied to the fate of State Trust land. Given the uncertain future of State land, it is difficult for private land owners to consider land protection measures such as conservation easements on their own land. There are numerous ways that State land open space preservation could be stabilized ranging from longer leases to purchase or transfer of State land development rights to establishment of State range land preserves. We hope that stabilizing the future of State Trust lands in the Altar Valley will be considered as a goal of the Plan.

Altar Valley Conservation Alliance Comments *Sonoran Desert Conservation Plan 1/15/99 p. 3-4*

3) Regarding ranch conservation (pp. 5-9). As we mentioned above, we are pleased to see that ranching recognized as a vital part of Pima County's heritage and future. We are pleased to see Altar Valley ranches included as a component of the open space preservation puzzle, and at the same time the recognition raises concern since the Plan provides so little detail about what the County has in mind. We hope that you will allow us to work directly with you to plan for our area. Please note that your Figure 4. Ranch and Agricultural Use map has some errors and omissions, for example "King" is the Anvil Ranch. Chilton family ranch lands around Robles Junction are not represented nor are the Palo Alto or Encinas Ranches, to mention a few examples.

4) Regarding the Robles Ranch (p. 10). We support restoration and use of the historic Robles Ranch as a community center.

5) Regarding the Mountain Parks (pp. 16-18). We would like to point out that the Mountain Park aspect of the Plan was one element that caused widespread concern. At first glance, the Plan would lead one to believe that any private or leased land within a proposed Mountain Park would be subject to serious management changes, possible condemnation or the like. Philosophically speaking, this apparent threat to private property rights and additional layer of potential public management direction provoked a negative response. The media splash that accompanied initial public display of the Plan did not clarify points that had raised doubts. We would hope that well managed ranch operations would continue to be a positive part of the open space preservation in Mountain Parks, as you have suggested in your Ranch Conservation section.

6) Regarding Corridor Conservation (pp. 18-19). The Los Robles/Brawley/Altar Wash Complex is highlighted as an area for Habitat, Biological, and Ecological Corridor Conservation. We really cannot comment in detail, as the Plan provides no detail as to what this corridor designation will mean relative to the significant parcels of private property and the important adjoining State lands leased historically for productive agriculture. We are concerned about stewardship of the Brawley Wash area, and hope to identify ways to enhance this watercourse through our Watershed Resource Assessment Project funded by the Watershed Protection Fund. As with the Ranch Conservation element of the Plan, we hope the County will work directly with us to determine how this corridor will be protected and managed.

7) Regarding Critical and Sensitive Habitat (pp. 20-22). We feel that this section needs significant development. We have a great deal of site-specific experience regarding endangered species situations among our members. We want to part of developing this Plan to assure that species concerns are addressed, as well as the interests of the people using the land. It is important for you to understand that we are wary of the Endangered Species Act (ESA). Many people are using the ESA as their primary legal tool in their efforts to systematically remove grazing from public land. Arbitrary use of the ESA severely threatens ranching. Ironically, this situation has contributed greatly to sale and subsequent development of ranch lands that were once prime open space and habitat.

All this said, we are willing to jump in and contribute to making this Habitat Conservation Plan work for all of us. We sincerely hope that others involved in further development of this Plan will pause to realize that threatened and endangered species living on ranch lands are probably there because of good stewardship by ranchers, not in spite of ranching.

Altar Valley Conservation Alliance Comments *Sonoran Desert Conservation Plan 1115/99 p. 4-4*

More specifically, the current draft of the Plan seems to be focused on the Cactus Ferruginous Pygmy Owl. This bias is understandable, given that conflicts over how to protect the pygmy owl were the major impetus for developing the Plan. The Plan doesn't even mention Pima County's 18 threatened or endangered species -- the list provided in the Resolution appended to the December 3, 1998 Board of Supervisors Memorandum. Maeveen Bchan suggested to us that one of our primary reasons for supporting the Plan should be that endangered species challenges affecting us now or in the future would be addressed regionally for all of us. At this point, it would appear that the Plan will need to broaden it's attention significantly to achieve this goal. In addition, we are concerned about current and future critical habitat designations and what they will mean to us. Our collective experiences have also taught us that the science of endangered species situations can be highly political. It will be extremely important that all parties involved in developing the Plan support the scientific methods chosen and the personnel contracted or assigned to do the work.

8) Regarding Funding and Implementation (p. 24). We agree that public / private partnerships and intergovernmental cooperation will be important. As we discussed earlier, coordination with the State Land Department regarding State Trust lands will be crucial.

9) Regarding Land Use Policy (pp. 31-32). To be honest, we have not had time to discuss these policies individually nor determine how they would affect the Altar Valley. We are definitely interested in participating in further development of these policies and do apologize for not having specifics to offer at this time.

We understand that you are refining plans for how to organize people interested in helping with the Plan. We would like to offer the time and expertise of several members of our organization -- Pat King, Mary Miller, Micaela King, Andrew McGibbon and Sue Chilton. In addition, our organization as a whole would like to meet with your staff regularly to work on portions of the Plan specific to the Altar Valley. We would be happy to provide whatever additional information you might need about our organization or members. We appreciate your attention to our comments and look forward to working with you.

Sincerely,



Pat King, President



Mary Miller, Secretary

Attachment: Altar Valley Conservation Alliance Membership List (Mail Only)

**George R. Bender
3509 W. Blacksill Dr.
Tucson, AZ 85741**

520-648-8752 Voice
520-648-8755 FAX

Date: January 15, 1999

Pima County Administrators Office
130 W. Congress
Tucson, AZ 85701

Dear Sirs,

I am interested in participating in the steering committee for the Pima County regional multi-species habitat conservation plan. It is my understanding that the steering committee would help in reviewing options and information from technical advisory teams for recommendations that would later go to the elected officials for consideration.

My reasons for seeking to be a member of the steering committee are:

I am a concerned employee of a mining company, Cyprus Sierrita, which is near one of the areas proposed for protection in the Sierrita Mountains. I want to see that mining is considered in the process.

I am the Vice President of the Tucson Chapter of People for the USA, which has over 100 members in the Tucson area. We support private property rights, multiple use of public land, and use of facts and good science to make public policy decisions. I want to see that this philosophy is considered in recommendations on the plan.

As a resident, property owner, and parent in northwest Tucson I am concerned about the effect on property taxes, the construction of facilities(such as Pima College) and access for outdoor recreation. I am particularly interested in the possibility of having a northwest area Pima College campus built since this would reduce the commuting for my children while they attend classes.

Sincerely,



George R. Bender

PURE WATER COALITION
630 East Second Street
Tucson, Arizona 85705
Vox: 622-5222 Fax: 622-2256
e-mail: juliani@azstarnet.com

15 January 1999

Mr. C.H. Huckelberry
County Administrator
Pima County, Arizona
Fax 740-8171

in re: Sonoran Desert Protection Plan
Steering Committee

Dear Mr. Huckelberry,

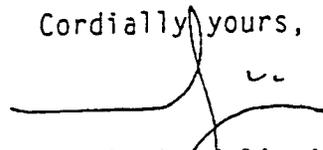
On behalf of the Pure Water Coalition this is my application and request to be appointed to the Steering Committee of the Sonoran Desert Protection Plan.

I understand that present thinking has it that the Steering Committee will function for around two years, and that it shall meet, normally, about once per month.

I pledge that, if named to this Committee, I will be a diligent member, will attend all meetings unless prevented by *force majeure*, and will do my best to make a positive contribution to attaining its goals.

With thanks for your consideration, I am,

Cordially yours,



Gerald B. Juliani
Spokesman

THE STATE



OF ARIZONA

GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000
www.gf.state.az.us

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Chairman, Herb Guenther, Tucson

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William Bertau, Tucson

M. Jean Hassell, Scottsdale

Dennis D. Manning, Alpine

Director

Duane L. Shroufe

Deputy Director

Thomas W. Spalding

January 15, 1999

Mr. C.H. Huckelberry
County Administrator
Pima County Governmental Center
130 W. Congress
Tucson, Arizona 85701

Re: Sonoran Desert Conservation Plan for Pima County

Dear Mr. Huckelberry:

The Arizona Game and Fish Department (Department) appreciates Pima County's close coordination with our agency during development of the Sonoran Desert Conservation Plan (SDCP). Consistent with the Department's November 30, 1998 comment letter on the October draft of the SDCP, we look forward to working cooperatively with Pima County and other entities on this planning effort. Some specific comments on the SDCP have already been provided to Pima County in our last letter and at recent meetings. The Department anticipates providing additional comments on the SDCP throughout the planning process associated with this effort.

During the review period for the October version of the SDCP, interested parties were invited to notify Pima County of their interest to participate in the Steering Committee tasked with development of a multi-species habitat conservation plan. The Department respectfully requests full representation on this Steering Committee.

Again, thank you for the opportunity to be involved in the development of the Sonoran Desert Conservation Plan for Pima County. If you have any questions regarding this letter, please contact me at (602) 789-3604.

Sincerely,

A handwritten signature in cursive script that reads "David L. Walker".

David L. Walker
Habitat Branch Chief

DLW:sr

cc: Duane L. Shroufe, Director, Arizona Game and Fish Department
Bruce D. Taubert, Assistant Director, Wildlife Management Div.

January 15, 1999

Received
1-15-99
JEL

Ms. Maeveen Behan
COUNTY ADMINISTRATORS OFFICE
130 WEST CONGRESS, 10TH FLOOR
TUCSON, AZ 85701

Dear Maeveen,

I would like to be added to the list of candidates for the steering committee for the Sonoran Desert Conservation Plan.

I will be happy to provide you with any information you need regarding my qualifications to serve on this committee.

Through my abilities, my background, and my experience, I believe I would be a valuable member of this committee.

Please advise... All the best



CHARLES AWARD

3661 N. CAMPBELL, #314, TUCSON, AZ 85719

TELEPHONE: 293-1020



January 15, 1999

C.H. Huckelberry
Pima County Administrator
130 West Congress, 10th Floor
Tucson, Arizona 85701

Dear Mr. Huckelberry:

I am writing to request a seat on the steering committee of Pima County's upcoming regional multiple species conservation planning process for the Southwest Network for Environmental and Economic Justice. I am a grassroots facilitator in search of connecting bioregional issues and people across political boundaries.

The Southwest Network for Environmental and Economic Justice, a grassroots network of people of color, community based groups, Indian nations and independent trade unions along the southwestern part of the United States and northern part of Mexico, is deeply concerned and committed to stopping "rezoning" strategies which only serve corporate greed without consideration or respect for Mother Earth, culture, history and the disenfranchised.

Environmental and economic justice requires that we as individuals make personal and consumer choices to consume as little of Mother Earth's resources and to reprioritize our lifestyles to insure the health of the natural world for present and future generations. Environmental justice mandates the right to ethically balanced and responsible uses of land and renewable resources in the interest of a sustainable planet for humans and other living creatures.

Please keep me informed as to upcoming steering committee meeting dates and times.

Sincerely,

Teresa Leal
Co-Chairperson, SNEEJ

441 Grand Ave. Suite 7 #7
Nogales, Arizona 85621
(520)287-6317
(520)287-4349 fax
borderlands@theriver.com

cc: Pima County Board of Supervisors



January 15, 1999

C. H. Huckelberry
Pima County Administrator
130 West Congress
Tucson, Arizona 85701-1317

Dear Mr. Huckelberry:

On behalf of Defenders of Wildlife, a national conservation organization dedicated to the protection of plants and animals and their native habitats, we are pleased to provide you with comments on Pima County's Draft Sonoran Desert Conservation Plan and Preliminary Work Plan for Endangered Species Protection. Defenders, with over 300,000 members and supporters nationwide, including over 6,000 in Arizona, is an active member of the Coalition for the Sonoran Desert Protection Plan. In addition, as an independent organization, we are committed to promoting regional, ecosystem-level conservation planning in Pima County and to aggressively protecting the Arizona population of the Cactus Ferruginous Pygmy-Owl (*Glaucidium brasilianum cactorum*; hereinafter, "pygmy-owl").

Sonoran Desert Conservation Plan

The task for the SDCP is huge: crafting a system of lands that will preserve the natural resources and landscapes that attract and keep people in Tucson, while managing the huge influx of residents expected in the coming decades. The thought of developing 160 square miles of additional land to accommodate that influx, and the impacts to air and water this will likely have, is nightmarish to current residents. The SDCP clearly articulates the scope of this problem, and represents the beginning of a visionary plan that has the potential to lead to the preservation of important habitats and historic features into the future. The recent unanimous vote by the Tucson City Council to join with the County in the SDCP is auspicious.

The County is currently being tested by proposed upzonings on land parcels of varying size, the development of which has a detrimental cumulative impact on the environment. With regard to Canoa Ranch, we applaud the County's decision to defer to and be consistent with the principles set forth by the draft SDCP. In keeping with these principles to avoid making land use decisions on a piecemeal basis, we maintain our position that all proposed upzonings for lands likely to have ecological and historical value be denied in the interim. In addition, we recommend taking this policy one step further to deny all upzonings until such time as an

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<http://www.defenders.org>

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assessment of the cumulative environmental impacts of development has been done.

While Defenders appreciates SDCP's broad six-pronged approach, it is important to note that from an ecological perspective, the proposed land acquisition to date, while praiseworthy, is not based on a comprehensive assessment of lands needing protection to ensure recovery of at-risk species or on scientific principles of biological linkages. As such, mere protection of proposed lands to date is not likely to achieve the goals set forth in the SDCP unless further land acquisition, protection, and regulation is initiated and completed. One specific example is "Riparian Restoration", which ideally should require future projects to be determined based on scientifically determined ecological requirements. Acquisition priorities may change based on the production of the biological assessment yet to be completed.

Based on the apparent intent of the SDCP as well as Defenders' commitment to maintaining current survival of the pygmy-owl population in Arizona, we believe that the SDCP omits key tracts of land in need of immediate protection. This cannot wait years for the completion of the biological assessment, as further delay will likely preclude survival of this extremely endangered species. In addition to furthering species protection, the up front acquisition of as much land currently known to be sensitive will make the upcoming mscp process that much easier. We have several preliminary recommendations for land acquisition/protection to this end and would like to communicate with the County, AGFD, FWS, and private landowners to facilitate protection of other areas in need of immediate attention for this reason in the very near future.

Tortolita Mountain Park Expansion

Defenders believes that due to recently obtained information about the heightened importance to pygmy-owls of land slated for development at Dove Mountain, we would like to see the proposed Tortolita Mountain Park expanded to include all undeveloped areas of Dove Mountain, including the "Bajada" acreage in addition to Ruelas Canyon which the SDCP proposes to acquire as part of the Tortolita Mountain Park expansion. The expansion of this particular mountain park definitely falls under the category of "Critical and Sensitive Habitat Preservation" as well.

Ecological Corridor Conservation

In line with the County's proposed acquisition to link the Tortolita Mountains with the Santa Catalina Mountains, we also believe that protection of currently undeveloped land connecting the Tortolita fan across I-10 to the Tucson Mountains as well as to the Silverbell Mountains warrants immediate action. Maintaining the currently vegetated linkages that are likely to connect existing pygmy-owls in the Tortolitas to the remainder of the Arizona population further west should be a priority.

Critical and Sensitive Habitat Preservation

The site of the proposed new high school for the Amphitheater School District, as one of the most heavily documented areas used by pygmy-owls in the northwest Tucson area, certainly warrants immediate acquisition. As such, it is also important to acquire or otherwise protect currently undeveloped land which would connect the Amphi site to the southern end of the

Page 3 of 6 / Defenders of Wildlife

Tortolita Mountains as part of "Ecological Corridor Conservation" and "Tortolita Mountain Park Expansion". Another example of important pygmy-owl habitat in need of immediate protection would be any fledgling dispersal corridors, documented by the Arizona Game and Fish Department, which are at risk of being developed. If areas such as these are not protected in the interim, short-term as well as long-term survival of the species will be precluded.

If the County would like further input about these and other important areas in need of immediate protection, we would be interested, willing, and eager to discuss these with you.

Preliminary Work Plan to Achieve Interim and Long Term Goals Related to Endangered Species and Habitat Protection

Defenders is most interested in the Work Plan, which is appended to the end of the draft SDCP. As a national conservation organization and as an environmental group with substantial staff presence in Tucson, we hope that we can continue to work closely with you in making Pima County's proposed multiple species habitat conservation a scientifically responsible model that the rest of the nation can follow. As we articulated in a December 15, 1998 letter to you, the pygmy-owl is the driving force behind the Department of Interior's considerable attention to this issue and funding for multiple-species planning at the regional level. The known pygmy-owl population in Arizona is extremely small and relatively little is known about this species; therefore, the work plan's goal of "a high environmental standard of long term survivability" will require a high degree of habitat protection. The conservation plan must start with protection of currently occupied pygmy-owl habitat, and the umbrella of protection must extend to previously occupied habitat and lands necessary for feeding, reproduction, sheltering, and dispersal. Critical habitat that will be designated by the U.S. Fish and Wildlife Service must be included among protected lands as well. We hope that there will be close coordination with the Fish and Wildlife Service's pygmy-owl recovery team throughout the mscp process.

Our national perspective on this issue is contained in a Defenders' report entitled Frayed Safety Nets: Conservation planning under the Endangered Species Act. The report, published in 1998, is the first detailed, comprehensive analysis of endangered species conservation planning to date, and it includes information about all aspects of different types of private landowner agreements. The report contains an analysis of 24 representative conservation plans from across the country, including several regional HCPs designed to bring urban growth in compliance with the Endangered Species Act (ESA). The report highlights the best and worst examples of various aspects of conservation planning. We hope that you will consider the report's recommendations as you craft a conservation plan that will avoid the problems of HCPs in other cities and set an example of science-based conservation. In particular, we recommend that HCPs enhance the recovery of listed species, that large-scale HCPs (such as Pima County's) have independent scientific review of multiple stages of the process, that HCPs define biological goals, and that biological monitoring and adaptive management direct ongoing implementation.

The fate of the pygmy-owl in Arizona largely lies in Pima County's planning efforts and in interim

protections, and we commend the County for the first steps taken in this direction and encourage the County to continue to take further steps toward conservation of this critically endangered species. The County's demonstrated commitment to protect pygmy-owl habitat in Arthur Pack Park is an excellent interim measure. Nevertheless, a number of parcels of land with prime pygmy-owl habitat within Pima County and adjoining jurisdictions have been lost since the bird was listed as endangered, and further loss of habitat is likely to preclude long-term survival of the pygmy-owl before a conservation plan is in place. Interim solutions will require substantial protection of private lands in Pima County, and we are pleased that your office is working with Defenders and the Coalition on interim solutions.

We are encouraged to see that the Work Plan contains a number of interim pygmy-owl studies to be carried out.

More Comprehensive Surveys

More comprehensive surveys are essential to science-based planning. We are enclosing a copy of a letter from a group of esteemed scientists commenting on the survey protocol for the pygmy-owl. This group of some of the most knowledgeable and prominent ornithologists and conservation biologists from across the country have agreed that an ultraconservative approach could be taken to detect and protect pygmy-owls, and that the loss of even one individual bird could severely undermine Pima County's goal of long-term survival of this species in Arizona. For further information, please refer to the survey protocol comment letter submitted by a number of conservation organizations including Defenders of Wildlife. This letter was previously sent to your attention. It is also important that only qualified surveyors be retained; we recommend that individual surveyors be approved by Region 5 of the Arizona Game and Fish Department.

Telemetry Studies

Telemetry studies are also a priority research tool for learning more about pygmy-owl behavior, demographics, habitat utilization, and dispersal patterns. Because pygmy-owls with radio transmitters are at higher risk of mortality, these studies should only be conducted such that the benefit to the population is greater than the cost to the population. This work should be done in conjunction with Region 5 of the Arizona Game and Fish Department.

Habitat Assessments

A scientific habitat assessment is clearly necessary. As with other aspects of biological research, independent, academic scientists should be selected to perform this important work in conjunction with Region 5 of the Arizona Game and Fish Department.

Population Viability Analysis

Population viability analysis may be useful, but only to the extent that accurate information determines the parameters of the model. At this time, this tool may be misleading to decision-makers, as not enough surveys, telemetry studies, habitat assessment, and genetic evaluation have been performed to date to inform the analysis.

Page 5 of 6 / Defenders of Wildlife

Generic Research

Genetic research is not an immediate priority, certainly not on the same level as surveying, telemetry, and habitat assessment, but it is ultimately necessary to produce an accurate population viability analysis. It would also generate information about how genetically similar birds in the Arizona population are to those in northern Mexico; this information may assist in recovering the species in Arizona. Despite being a lower priority, if birds are to be captured for purposes of telemetry and banding, we recommend obtaining genetic samples from them at the same time in order to reduce the extent to which each bird is handled. Considering the current lack of demographic and natural history information about the pygmy-owl, discovering more about the genetic relationship at this time between the Arizona population and other pygmy-owl populations, especially those in Texas, eastern and southern Mexico, will do little to inform management decisions under Pima County's plan. By virtue of the international border, the Arizona pygmy-owl population is protected by the ESA as a distinct population segment, regardless of its genetic relationship to pygmy-owls in Sonora, Mexico.

Overall, we are pleased to see Pima County's commitment to conservation planning based upon good scientific information. As we articulated in our December 15, 1998 letter to you, scientific habitat assessments should be contracted to independent, academic scientists working in conjunction with Region 5 of the Arizona Game and Fish Department, and not to biological consultants who work for the development industry. The Work Plan articulates the benefits of scientific oversight and peer review, and such oversight is an important component of a science-based plan. In the future, the County will need to clarify how and when such oversight and review will occur. As a starting point, we suggest that peer review be incorporated at various stages of the process, starting early on. A review after the plan is negotiated is unlikely to be effective (again, see Frayed Safety Nets). As for public involvement and input from stakeholders, it appears that the County is developing an effective process of inviting representatives from stakeholder groups to participate in the steering committee - this will strengthen the plan in the long-term.

In addition to our comments contained herein, we would like to endorse the comments submitted by Buffers on December 26, 1998.

Thank you for the opportunity to comment on the SDCP and the related Work Plan for the SDPP/MSCP. We hope that we can continue to work together to make sure that these plans protect Pima County's natural resources, including the pygmy-owl. In that spirit, we reiterate the request of Defenders' President, Rodger Schlickeisen, that we establish regular communication and meetings between your staff and Defenders' staff and restate Defenders' interest in being represented on the mscp steering committee. In addition, Defenders plans to actively lobby in Washington, D.C. to secure Land and Water Conservation Fund appropriations in order to further conservation goals within the scope of this regional planning effort.

Page 6 of 6 / Defenders of Wildlife

We look forward to communicating with you soon.

Sincerely,



Andra S. Ewton
Southwest Coordinator

Laura Hood
Program Manager, Conservation Planning

John Fritschie, Esq.

cc: Pima County Board of Supervisors

Enclosure

January 15, 1999

Tammie Clark, Director
U.S. Fish and Wildlife Service
1849 C Street NW
Washington, DC 20240

Tom Gatz
U.S. Fish and Wildlife Service
Arizona Ecological Services Field Office
2321 West Royal Palm Road, Suite 103
Phoenix, AZ 85021

Re: Survey Protocol and Critical Habitat for the Cactus Ferruginous Pygmy-Owl (*Glaucidium brasilianum cactorum*)

The purpose of this letter is to comment on the development and design of survey protocols for the endangered Cactus Ferruginous Pygmy-Owl in Arizona (*Glaucidium brasilianum cactorum* — hereinafter, "pygmy-owl"), and to lay out principles designating pygmy-owl critical habitat. The pygmy-owl was federally listed as endangered in April 1997 in Arizona due to its small population size and its perceived decline due to loss of habitat. We understand that the U.S. Fish and Wildlife Service (hereinafter, "Service") will use the results of surveys to determine presence or absence of owls on both private and public lands and thus decide how habitat should be managed for eventual recovery of the species. We also understand that critical habitat for the species may soon be designated.

Development and use of adequate and scientifically appropriate survey protocols are critical for determining the status of this species because of the extremely small size of the pygmy-owl population in Arizona. Recent surveys for pygmy-owls in Arizona found fewer than 35 individuals, 16 of which were fledglings, an age group with high mortality during their first year. The Arizona population is so small that it may become extinct as a result of natural stochastic factors in its environment, such as periods of drought, in addition to habitat loss. Based on historic observations, there is little protected suitable/potential habitat left for the long-term survival and recovery of the species. Many of the habitats used by pygmy-owls, such as mesoriparian, xeroriparian, upper bajada and desert scrub lands, are difficult to restore once modified or developed. Consequently, the loss of even a single bird or nesting site may greatly diminish the long-term chances of recovery for the species.

To illustrate the problem, in 1998, the Acting Director of the Service's Arizona Field Office relied upon the result of a single survey to determine that a particular site was not occupied, even though a nesting pair had been found at that location the previous year, and birds had been found the area for several years prior to the survey. Subsequent to the Acting Director's determination, the site was graded and therefore permanently rendered unsuitable to the pygmy-owl.

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As scientists with experience conducting surveys of owls and other raptors, or with the study of rare species or bird species in general, we urge that the Service adopt the most comprehensive and conservative approach possible in developing its survey protocol, and that the protocol adhere to widely accepted scientific standards (e.g. Ralph et al. 1993). Given the small number of known birds, we urge that in surveying for the pygmy-owl every precaution be taken to increase the likelihood of detecting any pygmy-owls that may be present. Specifically, we recommend at least four surveys per year at a particular site, since the owls may not be detected on the first or even third visit. Because pygmy-owls are more likely to be detected during one stage of their breeding cycle than another, the four surveys should be spread throughout the breeding season, but with two surveys conducted between February 15 and April 15 (spaced 30 days apart).

At least three or four years of surveys should be conducted in areas known to have been recently or historically occupied, currently occupied sites, areas deemed critical habitat, and other areas having a high likelihood of occupancy or otherwise important to the survival of the species (e.g. dispersal corridors) before a site is deemed likely to be unoccupied. While this may appear overly cautious, extreme prudence is dictated by several factors. First, we currently do not have a good understanding of the habitat requirements of the pygmy-owl. Second, previous studies in Texas have shown that cactus ferruginous pygmy-owls present at a site may not always be detected using standard methods (Proudfoot and Beasom 1996). Third, in small and declining populations like that of the pygmy-owl in Arizona, territorial use may vary from year to year and not all suitable sites will be occupied every year. Fourth, in highly variable environments like the southwest, currently unoccupied but suitable breeding territories may be critical for populations, and can serve as a buffer that will allow them to respond to changing environmental conditions ("reserve sites"). Finally, we note that once developed, sites may become permanently unsuitable for future use by pygmy-owls, and thus may permanently impede the recovery of the species. Sites identified within or partially within active territories or home ranges in prior years should be afforded additional protection and surveying.

In our opinion, the Service should finalize and adopt adequate landowner guidance and a science-based survey protocol as soon as possible. An adequate protocol should be in place during this pygmy-owl breeding season. If that is not possible, we recommend that an interim survey protocol incorporating these principles and suggestions be implemented right away.

We believe that critical habitat for the pygmy-owl should include not only sites currently used by pygmy-owls, but also sites with suitable/potential habitat that were previously occupied, and dispersal habitat (which includes habitat for new fledglings to establish territories). This habitat includes areas of northwest Tucson where pygmy-owls are currently breeding and fledging successfully. For occupied and previously occupied sites, protection of habitat including lands necessary for reproduction and recruitment, feeding, sheltering, dispersal to suitable/potential habitat, and connectivity between existing members of the species is crucial.

We request that this letter be included in the administrative record with regard to the Proposed Landowner Guidance and Survey Protocol, and Proposed Critical Habitat. Each one of us is

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signing this letter as an individual, not as a representative of affiliated institutions or organizations. Thank you very much for your time, and we are available to provide any additional information that you might require regarding our suggestions.

Sincerely,

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Literature Cited

Proudfoot, G.A. and S.L. Beasom. 1996. Responsiveness of cactus ferruginous pygmy-owls to broadcasted conspecific calls. *Wildlife Society Bulletin* 24(2): 294-297.

Ralph, C.J., G.R. Geupel, P.Pyle, T. Martin, and D.F. DeSante. 1993. Handbook of Field Methods for Monitoring Land Birds. USDA Forest Service Pacific Southwest Research Station General Technical Report. PSW-GTR 144.

cc: Arizona Game and Fish Department Region 5
Pima County Administrator
Pima County Board of Supervisors
Gail Kobetich, Fish and Wildlife Service