

Coalition for Sonoran Desert Protection

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Arizona Center for Law in
the Public Interest
Arizona League of
Conservation Voters
Education Fund
Arizona Native Plant Society
Buffers
Center for Biological
Diversity
Center for Environmental
Connections
Center for Environmental
Ethics
Defenders of Wildlife
Desert Watch
Drylands Institute
Environmental and Cultural
Conservation Organization
Environmental Law Society
Friends of Cabeza Prieta
Friends of Tortolita
Gates Pass Area
Neighborhood Association
Neighborhood Coalition of
Greater Tucson
Northwest Coalition for
Responsible Development
Northwest Neighborhoods
Alliance
Oro Valley Neighborhood
Coalition
Pima Farms/Scenic Drive
Neighborhood Association
Protect Land and
Neighborhoods
Safford Peak Watershed
Education Team
Save the Scenic Santa Ritas
Sierra Club-Grand Canyon
Chapter
Sierra Club-Rincon Group
Silverbell Mountain Alliance
Sky Island Alliance
Sky Island Watch
Society of Ecological
Restoration
Sonoran Arthropod Studies
Institute
Sonoran Permaculture Guild
Southwestern Biological
Institute
Tortolita Homeowners
Association
Tucson Audubon Society
Tucson Herpetological
Society
Tucson Mountains
Association
The Wildlands Project
Wildlife Damage Review
Women for Sustainable
Technologies

March 6, 2006

Mayor and Council, City of Tucson
255 W. Alameda
Tucson, Arizona 85701

**RE: March 7 Mayor and Council Study Session Item #2, Environmental Planning
Habitat Conservation Plan (HCP)**

Dear Mayor Walkup and City Councilmembers:

In 1998 the Coalition for Sonoran Desert Protection formed with over 40 environmental and neighborhood groups whose mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive habitat and land-use planning. The Coalition has been working since that time primarily with Pima County and federal officials on the county's Sonoran Desert Conservation Plan (SDCP), which aims to balance the needs of the environment with the reality of growth by *using the best available science* to identify and preserve lands for conservation while directing development to less biologically valuable areas. The Coalition is the only local organization whose sole mission is development of regional habitat conservation plans.

The Coalition would like to commend the City of Tucson for embarking upon a habitat conservation planning process with the goal of aiming to "*promote conservation of natural resources* while providing for future growth." (emphasis added). We are pleased with the City's objective to comply with the Endangered Species Act (ESA) for both urban development and City capital improvement projects, and particularly would like to thank the City for seeking to "*complement other regional conservation planning efforts such as Pima County's Sonoran Desert Conservation Plan and the Town of Marana HCP project.*"

The biological goal of the SDCP's Habitat Conservation Plan, is "*to ensure the long-term survival of the full spectrum of plants and animals that are indigenous to Pima County through maintaining or improving the habitat conditions and ecosystem functions necessary for their survival.*" The Coalition supports this goal, and is pleased that the City would like to work regionally in achieving it.

Pima County has undertaken a rigorous scientific process – one that has been developed by the local and national biological expert community — for the SDCP. While the City can and should conduct site-specific biological studies, the City HCP should embrace the "ecosystem-based" approach of the SDCP and the City's plan should dovetail with this regional effort.

It is somewhat ironic that the environmental community is supporting habitat conservation plans, as the purpose of ESA Section 10 is to provide a mechanism that will allow "take" of endangered and otherwise threatened species both through destruction of habitat and direct lethal take of individuals. However, we are optimistic that the City will create strong conservation measures to mitigate for urban growth-related activities within its jurisdiction.

For the last year and a half, the Coalition has had representation on the City's Stakeholder Advisory Committee and the City's Technical Advisory Committee, working with others to develop conservation and implementation strategies for the HCP. The draft that we are commenting on today is very preliminary; therefore the Coalition will limit our comments to the most critical issues that must be addressed before the permit is finalized. We fully expect that City staff, consultants, and citizen committees will continue to develop implementation and funding strategies. Before the HCP is final and a permit application is submitted to the US Fish and Wildlife Service, the following issues will need to be detailed:

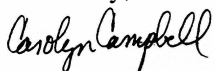
- Specific activities that will impact species' habitat;
- Total acreage impacted by those activities and acreage ratios to mitigate for those actions;
- Reserve design for mitigation lands;
- Acquisition plan to preserve mitigation lands in perpetuity;
- Specific conservation measures and actions necessary to adequately protect these species;
- Fully developed and approved ordinances, land use plans and policies to implement the HCP;
- Fully developed management and monitoring plans;
- Estimated cost for implementing the acquisition, management and monitoring plans;
- Identified and assured funding source(s) for acquisition, management and monitoring.

The City may want to expand the permit area to all areas of future impacts, so as to include the current City limits as well as future expected annexation areas. Future impacts by Tucson Water are basin-wide throughout the City's service area and should be accounted for. Impacts to the pima pineapple cactus may not be adequately mitigated for without inter-governmental cooperation and a joint permit by the City, Pima County, State Land Department, and perhaps the Town of Sahuarita. The City should detail its riparian restoration plans and detail how effluent will be utilized for riparian restoration.

The Coalition will provide you and your staff members with additional and more detailed information on the Coalition's expectations in these areas, in the near future. We are hopeful that our continued participation will add value to the development of the HCP.

Once again, we appreciate the City's taking the initiative to undertake an HCP process. I will be in attendance at the Mayor and Council meeting on March 7 and would be happy to address you at that time should there be any questions or concerns. Otherwise, please feel free to contact me at 388-9925.

Sincerely,



Carolyn Campbell
Executive Director

Cc: Mr. Mike Hein, City Manager
Ms. Leslie Liberti, Environmental Planning Manager
Ms. Sherry Barrett, U.S. Fish and Wildlife Service