



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

Bat Conservation International

Cascabel Conservation
Association

Center for Biological Diversity

Center for Environmental
Connections

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Drylands Institute

Empire Fagan Coalition

Environmental and Cultural
Conservation Organization

Environmental Law Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro National
Park

Friends of Tortolita

Gates Pass Area Neighborhood
Association

Native Seeds/SEARCH

Neighborhood Coalition of
Greater Tucson

Northwest Neighborhoods
Alliance

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 for Ecological
Restoration

Sonoran Arthropod
Studies Institute

Sonoran Permaculture Guild

Southwestern Biological
Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

Women for Sustainable
Technologies

December 16, 2013

Chairman Ramón Valadez and Members
Pima County Board of Supervisors
130 W. Congress St., 11th Floor
Tucson, AZ 85701

RE: **Avra Valley Road & Interstate 10 Development Agreement Amendment**

Dear Chairman Valadez and Members:

On behalf of the 41 member groups of the Coalition for Sonoran Desert Protection, I respectfully submit the following comments on the proposed Amendment to the Avra Valley Road & Interstate 10 Development Agreement.

The Coalition has been a key participant with the County and others in the ongoing process to conserve and protect the critical wildlife linkage between the Tucson and Tortolita Mountains. The development agreement secured by Pima County with the I-10 Avra Valley Mining and Development L.L.C in 2008 was a significant achievement in the preservation of this wildlife linkage. The development agreement provided a future steady income stream to make further improvements to this highly constrained and “high priority” wildlife linkage.

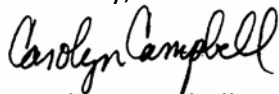
We have reviewed the proposed amendment to this development agreement and are largely in concurrence with the County Administrator’s recommendation that this amendment will benefit the County and should be approved. However, we have identified two sections of the agreement that we do not agree with; our concerns and recommendations are outlined below.

- 1) In Section 4.2.5, **delete the phrase, “with an emphasis on the County’s natural resource parks.”** The approved uses of the environmental fee in the development agreement should remain focused on the re-connection and protection of the Tucson-Tortolita Mountains Wildlife Linkage. This phrase implies that the revenue generated from the environmental fee should be used in Tucson Mountain Park and Tortolita Mountain Park and **not** on the wildlife linkage that connects them. We disagree with this assertion and encourage the Board to remove this phrase from the amendment. The remainder of the language in Section 4.2.5 provides ample flexibility to Pima County for funds to be appropriately expended on lands and activities in the Tucson Mountains – Santa Cruz River – Tortolita Mountains area.

- 2) In Exhibit A – Approved Infrastructure, the language in the section pertaining to the “Santa Cruz River Trail” is problematic. Again, this section runs counter to the re-connection and protection of the Tucson-Tortolita Mountains Wildlife Linkage. While a 16-foot wide paved river trail may not significantly inhibit the movement of wildlife through this wildlife linkage, there has not yet been sufficient evaluation of its impact, should a trail be constructed. **We request that County staff work with the Coalition to evaluate alternative route alignments that would best facilitate wildlife movement and achieve the County’s goal of trail connectivity in this area.**
- 3) Finally, the Coalition has provided leadership in bringing stakeholders together to achieve the goal of a functional landscape linkage between these two mountain ranges. These stakeholders include Pima County, Arizona Department of Transportation, Regional Flood Control District, Town of Marana, Arizona Land and Water Trust, Saguaro National Park, Tucson Electric Power Company, private landowners, Federal Highways Administration, Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and the Coalition for Sonoran Desert Protection. The Coalition has also reached out to involve Union Pacific Railroad. This Stakeholder Working Group has long discussed the need to have an oversight group to help guide the County in the expenditures of the Environmental Fee. **The Coalition requests that the County commit to this oversight committee, and convene the group at the appropriate time.**

We appreciate your consideration of our recommendations regarding the proposed Amendment to this Development Agreement. If you have any questions, please do not hesitate to contact me.

Sincerely,



Carolyn Campbell
Executive Director

cc: C.H. Huckelberry, Pima County Administrator
Nicole Fyffe, Assistant to the Pima County Administrator