

Arizona Riparian Council

Email to Kathleen.A.Tucker@usace.army.mil

December 4, 2017

Dear Kathleen Tucker,

Re: Permit #: SPL-2003-00826-KAT

The Arizona Riparian Council has concerns about the environmental impacts of this proposed permit and the associated development called Villages at Vigneto in the San Pedro watershed.

The San Pedro River and its tributaries provide a crucial wildlife corridor for resident and migrating wildlife. As a bird flyway the San Pedro River and its riparian area support many nationally and internationally migrating species. Another water-dependent feature in close proximity to the proposed development is Kartchner Caverns, a premier tourist attraction in southern Arizona.

The Corps' mission is to protect the Nation's aquatic resources. The viability of the San Pedro River and its associated riparian zone is severely threatened by diversions of surface flows and pumping of subsurface water in the watershed. In all, these removed waters previously contributed to both the short-term and long-term surface flow in the San Pedro River. Our concern is that this proposed development would further stress the river.

It can be reasonably foreseen that that issuing this permit will lead to a major development between Benson, the San Pedro River, and Kartchner Caverns. I could find nothing in the accompanying documents that addresses where the water for such a large residential and commercial development would come from. Without a detailed plan from the Applicant for securing the water necessary for the big project I believe it would be unreasonable for the Corps to permit the requested dredge and fill of the proposed 51 acres. The potential impacts (quantity and quality) to the River, wildlife, and the Caverns should be studied before considering issuance of this permit.

Sincerely,

Tim Flood
Co-chair, Conservation Committee
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