

## **Tucson Audubon Comments on Villages at Vigneto Final Community Master Plan**

**Karen Fogas, Executive Director, Tucson Audubon Society, 6/18/16**

Good evening Mayor King and Council Members. My name is Karen Fogas, Executive Director with the Tucson Audubon Society. Our offices are located in at 300 E University Blvd, #120 Tucson, AZ 85705. Established in 1949, Tucson Audubon's focuses its work in Southeast Arizona. ***Tucson Audubon inspires people to enjoy and protect birds through recreation, education, conservation, and restoration of the environment upon which we all depend.***

Part of my childhood was spent in a town the size of Benson in N Idaho, where many of my fondest memories occurred. I can appreciate that the City of Benson seeks to provide economic growth for its community. However, we have legitimate concerns that the Villages at Vigneto Community Master Plan, as currently proposed, is NOT sustainable. The best available information suggests the future could look very grave for the community and its residents in the face of predicted water shortages. Because there is so much at stake, and because the City has a moral responsibility to ensure that the developer has an adequate supply of water, the City should, as a condition of approval, require a new permit from ADWR that accounts for the additional 4,000 acres and the additional 20% cited in the development agreement. We are advocating for additional updated scientific information that would prevent the City from incurring liability should predicted impacts occur. Predicted water shortages will not only impact the current and future City of Benson, including Vigneto, but also quality of life for people and habitat, and for birds and wildlife, some of which are threatened or endangered. As the permitting entity, the city may put itself in the position of being required to develop a habitat conservation plan. We are concerned that without carefully considering impacts to water and endangered species, the City of Benson is creating a significant liability in a rush to approve a sweeping, flawed CMP for Vigneto.

There IS ample information to suggest that the CMP before the council today is in direct conflict with Benson's General Development Plan's goal to "protect the San Pedro River," described in the Plan as one of Benson's "key amenities." By relying solely on ADWR's 2008 assured water supply permit, to the exclusion of all other data, which did not consider impacts to the river or the addition of a significant development, Benson officials are failing in their duty to consider the development's impact upon the San Pedro River, nearby St. David Cienega,

the San Pedro Riparian National Conservation Area, and Kartchner Caverns State Park. Its current beauty is what helped draw these developers to Benson, and yet there is no attention being given to assuring that this resource – and the *current* economy that it supports – is sustainable. A largely dry riverbed, such as become of the Santa Cruz, and loss of habitat will not attract the development and economic security you seek, and may well *create a legal and financial liability for the City of Benson instead.*

The City has not exercised its responsibility on behalf of current and future residents, including Vigneto, to exact even nominally reasonable and prudent conditions of approval regarding potential adverse impacts of this mega-development, especially to hydrology. At the very least, requiring the USGS Phase III study and adequate and ongoing hydrological monitoring should be made a condition, at the developer's expense. Due to significant lag time between pumping and observed effects, even the most careful groundwater monitoring will not give the City sufficient time to react and protect the river, existing City residents and residents of the San Pedro Valley – suggesting even further need for proceeding with caution. Additionally, it would seem that a developer concerned about its future citizens and the community in which they will live would *want* to include such monitoring.

Dewatering the San Pedro River will undoubtedly adversely impact the region's local ranching and agriculture economy, not to mention over a \$24 million/year industry for watchable wildlife and associated ecotourism in Cochise County alone. Because the San Pedro River is a world-class birding destination, this development could adversely impact Arizona's \$1.4 Billion dollar economy. It will also compromise an international migratory pathway that provides such ecosystem value as pollination for crops, habitat for threatened and endangered species, disease vector control, water purification and other natural ecosystem services that we cannot afford to lose. The City of Benson has an obligation, on behalf of its current citizenry and on behalf of future generations to act responsibly to protect this resource. It has an obligation to consider ALL information relevant to this development, not just that which it chooses to consider because it favors the goal of economic growth so desperately wanted by its current City leaders. By so clearly failing to consider ALL available information, the City opens itself to the legal consequences of harm to its citizens and to its most important resource: the River.

Thank you for your consideration of our comments in your important decision tonight.