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Dr. Paul Green

October 30, 2008

Mr. Victor Kotwicki
U.S. Army Corps of Engineers
PO Box 1027
Detroit, MI 48231

Re: Proposed I-19 Border Patrol checkpoint, environmental issues, and adjacent Esperanza Ranch conservation easement

Dear Mr. Kotwicki,

Tucson Audubon Society is a 501(C)3 non-profit organization that promotes conservation, environmental education and outdoor recreation. Founded in 1949, Tucson Audubon has been at the forefront of these fields in southern Arizona for 60 years. Tucson Audubon is very concerned that the proposed location for the permanent Border Patrol checkpoint along I-19 near the Chivas Wash will have detrimental effects on wildlife and may violate the recorded conservation easement between James Olsen and Tucson Audubon.

There are several direct effects of the proposed checkpoint on wildlife and open space in northern Santa Cruz County. The proposed checkpoint is immediately south of Chivas Wash and the portion of the Esperanza Ranch conservation easement that extends west along the wash from the Santa Cruz River. As described by such notable scientists as Reed Noss, Michael Soulé, and Richard Forman, fragmentation of habitat is the chief threat to wildlife and ecosystem health and function; one of the greatest challenges facing us in the 21st century.

The area between Amado and the Tubac Golf Resort (just north of Tubac), including Chivas Wash, was identified as the only remaining “large-scale” wildlife crossing area in the Santa Cruz Valley and the one with the best long-term potential in terms of its biological assets (Rudy 2003:152-162).

The Chivas Wash, identified as a critical state wildlife linkage by Dr. Paul Beier and his colleagues at Northern Arizona University, in conjunction with the Federal Highway Administration, the Arizona Game and Fish Department, the Arizona Department of Transportation and others, is an important east-west wildlife corridor allowing movement of large mammals such as black bear, mountain lion, deer, and others between the Santa Rita Mountains to the east and the Tumacácori Highlands to the west (Beier, Majka and Bayless 2006). The Tucson Audubon conservation easement is highlighted in the detailed Beier et al. linkage report and is one of the most direct corridors between large blocks of protected lands in the region, with the least impact to private lands in the area.

The genetic health of small populations of keystone large wildlife species in isolated mountain ranges such as these depends on gene flow between populations—in this case necessitating movement of individuals between local populations. Chivas Wash is one of the very few areas where large culverts under Interstate 19 allow for safe passage of wildlife. Due to continued development in the Santa Cruz River Valley, places for wildlife to pass through the area safely, without threat to adjacent human health and safety, are dwindling.

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The concentrated, 24-hour human, canine, and vehicular activity immediately south of the wash will discourage wildlife from using this important corridor. The level of activity, light, and noise at the checkpoint will also affect wildlife in other adjacent parts of the easement to the east of the proposed checkpoint. This will be particularly true at night when nocturnal animals will be perturbed by light and noise. A 2006 study in Colorado showed that adverse impacts to wildlife from various types of development extend 200 meters in a “zone of influence” into natural undisturbed open space (Lenth, Knight and Gilbert. 2006).

Tucson Audubon manages the 300-acre conservation easement, Esperanza Ranch, located very near the proposed checkpoint and has expended vast amounts of work and funds to restore the easement to its natural state. Further, Tucson Audubon has been working in northern Santa Cruz County, in accordance with the Santa Cruz County Comprehensive Plan, to conserve wildlife, maintain open space, and preserve the rural nature of the region that is prized by residents. We are therefore concerned with impacts to quality of life, open space, and the safety of humans and wildlife that a proposed permanent Border Patrol checkpoint would have in this region.

It appears that the proposed checkpoint violates the terms of the conservation easement signed and recorded by Mr. Olsen and Tucson Audubon. This document places limits to development not only on the conservation easement lands, but it also limits the scope of development on non-easement Esperanza Ranch lands where the proposed checkpoint is located. We believe a border patrol checkpoint is not consistent with the terms of the legal document that established the easement. (See section D (3) at the bottom of page 5 of the attached conservation easement document.)

Tucson Audubon respectfully recommends that those determining the location of any proposed border checkpoint consider the effects of the above referenced information and find a more suitable location. Thank you for the opportunity to comment.

Sincerely,



Paul Green | Executive Director

Literature cited

Beier, P., D. Majka, and T. Bayless. 2006. Arizona Missing Linkages: Santa Rita—Tumacacori Linkage Design. Report to Arizona Game and Fish Department. School of Forestry, Northern Arizona University. [see <http://corridordesign.org/arizona/download.php> (scroll down to “Santa Rita – Tumacacori Mountains”) and http://www.dot.state.az.us/Highways/OES/AZ_WildLife_Linkages/assessment.asp.]

Lenth, B.A., R.L. Knight, W.C. Gilbert. 2006. Conservation Value of Clustered Housing Developments. Conservation Biology Volume 20, No. 5, 1445-1456

Rudy, M. 2003. Wildlife Linkage Design and Planning for Western Santa Cruz County, AZ. Masters Thesis, College of Architecture, Planning, and Landscape Architecture, University of Arizona.

Enclosure

cc Hon. Raul Grijalva, Hon. Gabrielle Giffords. Hon. Janet Napolitano

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