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# MEMORANDUM

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Date: December 27, 2021

To: The Honorable Chair and Members  
Pima County Board of Supervisors

From: Jan Leshner   
Acting County Administrator

Re: **Request at December 21, 2021 Board of Supervisors Meeting for Information on Riparian Habitat Mitigation Related to Utility Companies**

During discussion on Agenda Item 6 at the December 21, 2021 Board Meeting, Supervisor Grijalva requested additional information regarding whether riparian habitat disturbance prior to permit issuance was a common problem for utilities. The Regional Flood Control District (RFCD) reviewed its records regarding utility projects that required Riparian Habitat Mitigation Plans. Since 2013, the RFCD has authorized over 120 riparian habitat mitigation plans with 12 of them being utility projects including numerous sewer line extensions, water line extensions, and a gas line extension. There are no mitigation plans for power line transmission projects since they are statutorily exempt from floodplain management regulations.

Prior to the project on the December 21, 2021 Agenda, the RFCD had not identified any utility projects that disturbed riparian habitat prior to permitting. This project involved improvements to an existing well site which had been initially permitted in 2006. The site has been subject to ongoing operation and maintenance since then which may have led to the riparian habitat disturbance exceeding the 1/3 of acre threshold.

This situation differs from the typical utility project which usually consists of a pipe line extension involving new construction where there has not been previous development. For these types of linear projects, the RFCD works with applicants to avoid riparian habitat, wherever if possible. When avoidance is not possible, RFCD works with applicants to use construction techniques to minimize the width of disturbance through the habitat. Even with these techniques, larger projects often exceed the 1/3 of an acre threshold requiring a riparian habitat mitigation plan.

RFCD works to proactively educate utility companies, including power utilities, regarding the importance of riparian habitat and native desert vegetation types so they can be more selective in their construction and maintenance activities.

c: Carmine DeBonis, Jr., Deputy County Administrator for Public Works  
Yves Khawam, PhD, Assistant County Administrator for Public Works  
Suzanne Shields, Director, Regional Flood Control District