



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, TUCSON, AZ 85701-1317
(520) 740-8661 FAX (520) 740-8171

C.H. HUCKELBERRY
County Administrator

December 26, 2008

Jeanine A. Derby
Coronado National Forest Supervisor
Attn: Plan Revision
300 West Congress
Tucson, Arizona 85701

Re: Coronado National Forest's Land and Resource Management Plan Update

Dear Ms. Derby:

Pima County and the Coronado National Forest share similar interests in collaborative planning and decision making processes regarding the social, economic, and cultural impacts of public land and resource management decisions. In recognition of our mutual interests, Pima County and the Forest Service have established a recent Memorandum of Understanding outlining both parties' relationship with the development and implementation of the Forest Service's Land and Resource Management Plan. The Forest Service has three districts which operate in Pima County: the Santa Catalina, Nogales, and Sierra Vista districts. As a participant in the Forest Plan Update, Pima County offers the following considerations.

We would like to see support in the Forest Plan Update for increased or continued protection of water quality. As part of the water quality element for the Sonoran Desert Conservation Plan (SDCP), Pima Association of Governments and Pima County staff created a list of highest priority streams for water quality and quantity monitoring, management and restoration (see report, *The Water Quality of Priority Streams in Pima County*, <http://www.pima.gov/cmo/sdcp/reports\d19\092THE.PDF>). Stream selection was based primarily on the presence of perennial or intermittent flow, the areas of riparian habitat, the presence of historic or existing populations of native fish and frog species, and location with respect to other surface water sources and possible wildlife corridors. The Pima Association of Governments has identified 38 streams with perennial or intermittent reaches that had flows that originated in the Santa Catalina, Rincon, or Santa Rita mountains. Of these streams, several originating in the Coronado National Forest were prioritized for further study and protection, including Florida Canyon, Rincon Creek, and Wakefield Canyon. A comprehensive effort to ensure that the water quality of priority streams in Pima County is

Jeanine A. Derby

Coronado National Forest's Land and Resource Management Plan Update

December 26, 2008

Page 2

not degraded will likely involve three components: planning to identify future land uses that are appropriate near the streams; minimization of impacts from existing and future land uses; and regularly-scheduled monitoring to ensure that water quality and habitat of the streams is not degraded. We would like to encourage cooperation and collaboration in protection and in support for studies on these streams.

We also ask that the Forest recognize the community's interest in protecting the water quality of Davidson Canyon, which has its headwaters in the Forest. In 2005, Pima County and the Pima Association of Governments nominated Davidson Canyon for a State anti-degradation designation (known now as Outstanding Waters of the State of Arizona). The State recently approved this designation and the designation will become active in early 2009. The document detailing the nomination, entitled *Davidson Canyon Unique Waters Nomination*, is available at www.pagnet.org.

I encourage the plan update to address additional protection of groundwater supplies. The SDCP recognizes the important links between groundwater, streamflow, and vegetation that exist along some streams and springs in Pima County. Various components of groundwater-dependent ecosystems have been identified in Pima County: shallow groundwater zones, perennial and intermittent stream segments, and springs. The Coronado and its landscapes are essential in providing groundwater recharge through natural surface water recharge along washes and wetlands, and recharge that moves into bedrock faults and fractures in mountainous regions. We would like to see the Coronado National Forest Plan update prohibit the removal of additional groundwater in the Coronado National Forest for export off the Forest.

Leopard frogs and native fish were once found in locations throughout Pima County. As lowland sites were developed, dried out and invaded by non-native species, the native fish and frogs are now primarily found in mountain canyons. The report, *Aquatic Vertebrate Conservation in Pima County* at <http://www.pima.gov/cmo/sdcp/reports/d7\007AQU.PDF>) identifies sites in the Coronado that serve as refuge for leopard frogs and native fish. These sites are valuable for their ability to harbor native aquatic species and provide stock for natural dispersion or for transplants to suitable or restored locations. The report states:

"Without significant efforts to preserve habitat and species in mountain canyons, the Gila chub and the lowland leopard frogs may face extinction before we have any opportunity to return them to valley floors where they were formerly abundant."

It is critical to identify and protect key refuge sites, and to develop and implement conservation strategies in which current and developing land uses may be compatible with species preservation. A priority for these remaining sites is the removal of non-native species. Key canyons with invasive species threats include Romero Canyon, Sabino Canyon, Bear Canyon, Agua Caliente, and others listed in the report's gazetteer.

Jeanine A. Derby

Coronado National Forest's Land and Resource Management Plan Update

December 26, 2008

Page 3

Along with the aquatic species we recommend a careful evaluation of the opportunity for the Coronado National Forest to further protect and conserve special status plant and animal species Forest-wide. We would request that the Coronado National Forest operationally include priority vulnerable species identified in the Sonoran Desert Conservation Plan to the list of USFS identified species.

The Coronado National Forest has made significant efforts at invasive species removal, most recently in giant reed and buffelgrass removal efforts in the Catalinas. Pima County supports language in the update that reflects the Forest Service's dedication in invasive species issues, to reduce the spread of invasives, and to eliminate and prevent non-native invasive species where they occur. The update needs to address and give the Coronado National Forest the ability to utilize the full spectrum of strategies and techniques available to address current and future invasive species management needs.

Pima County supports the recommendations of the Sky Island Alliance's special interest areas in the Santa Catalina and Santa Rita districts. In the Catalinas, the proposed Finger Rock Canyon Research Natural Area and Agua Caliente Zoological Area are classified as Biological Core under the Conservation Lands System (CLS) of the SDCP. Designation of the special interest areas is consistent with land uses under the CLS designations.

The proposed Rosemont Valley Historical Area in the Santa Rita Mountains also merits consideration as a special management area to preserve this culturally significant area. This area exhibits the full historical heritage of the region – prehistoric and historic Native American cultures, Spanish Colonial and Mexican use and settlement, and American Territorial mining towns, mines and ranches, which can provide sustainable economic opportunities through heritage and nature tourism – key benefits to the region as noted in the Feasibility Study for the Santa Cruz Valley National Heritage Area. As a largely unspoiled area, the Rosemont Valley Historical Area provides a unique and exceptionally authentic experience for heritage tourism and nature tourism, which are currently the cornerstones of the regional tourism industry. We have previously transmitted to the Coronado National Forest a report about the historical significance of Rosemont Valley entitled "*Preserving the Santa Rita Rosemont Ranch*" (<http://www.pima.gov/cmo/sdcp/reports/d29/RosemontRanch.pdf>). The County further recommends that the Forest Plan update and minimize land designations that limit the ability for active management activities of the Forest and its management partners on a landscape level.

Recreational shooting is a legitimate use of the Coronado National Forest. The Forest Plan update needs to affirm the importance of that use and maintain opportunity across Forest lands. The Forest needs to provide designated sites with minimal safety enhancements that can be monitored and controlled and also be able to restrict use where unsupervised shooting results in a public health and safety issue, or compromises wildlife objectives.

Jeanine A. Derby
Coronado National Forest's Land and Resource Management Plan Update
December 26, 2008
Page 4

Access to public lands in southern Arizona continues to be a significant issue. The County encourages the Forest to continue to identify needs. Current and future Forest trail systems should be integrated with the Pima County Regional Trail System wherever possible.

We encourage the Coronado National Forest to consult on a government-to-government basis with American Indian tribes that have cultural ties to the area regarding traditional cultural places of significance. Protecting cultural heritage, including places where contemporary traditional practices continue, is important to these groups and to Pima County. The Coronado National Forest begins to address this topic in a briefing paper for Forest staff titled "*Overview of Traditional Cultural Uses and Traditional Cultural Places in Pima County and the Coronado National Forest*" (<http://www.pima.gov/cmo/sdcp/reports\d2\007OVE.PDF>). The paper suggests that while the current Forest Plan does not consider traditional cultural properties, the Forest Plan Update will describe existing and desired conditions of such resources.

Thank you for the opportunity to comment.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/jj

- c: The Honorable Chairman and Members, Pima County Board of Supervisors
 - John Bernal, Deputy County Administrator - Public Works
 - Suzanne Shields, Regional Flood Control District Director
 - Maeveen Behan, Director, Office of Conservation, Science and Environmental Policy
 - Rafael Payan, Natural Resources, Parks and Recreation Director
 - Linda Mayro, Cultural Resources Manager
 - Julia Fonseca, Program Manager, Conservation, Science and Environmental Policy
 - Nicole Fyffe, Executive Assistant to the County Administrator