COUNTY ADMINISTRATOR'S OFFICE
PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, FLOOR 10, TUCSON, AZ 85701-1317
(520) 724-8661 FAX (520) 724-8171

C.H. HUCKELBERRY
County Administrator

October 22, 2013

The Honorable Ron Barber, Representative
Second Congressional District of Arizona
1029 Longworth House Office Building
Washington, DC 20515

Re: **Impacts of Proposed Federal Actions on Pima County's Conservation Efforts**

Dear Congressman Barber:

The County is being besieged by proposed federal actions for projects such as electrical transmission corridors and natural gas pipelines, as well as the proposed Rosemont mining action, all of which will significantly impact County-acquired conservation lands. These proposed federal actions are combining to cause unprecedented possible impacts to past County conservation actions.

The County has expended considerable sums of taxpayer monies to conserve important historical, cultural, and biologically sensitive lands in eastern Pima County. I am enclosing a recent memorandum to the Board of Supervisors that includes a map of these properties and the proposed federal actions impacting them. These actions come from a number of federal entities and sources, including the Forest Service, Bureau of Land Management, federal Energy Regulatory Commission and others. The actions will impact the natural resources of the County; and, more importantly, they devalue the County's past investments in conservation property acquisition.

The purpose of this letter is to ask for your assistance in ensuring that federal agencies who advance or sponsor particular alternatives are cognizant of, and make commitments to, mitigate the direct and indirect economic impacts of their proposed actions. We have commented on numerous occasions on the adverse impacts being incurred and have cited the County's own land use policies and regulations as the conservation local standard that needs to be respected. Federal agencies need to require similar mitigation of impacts by

proponents of the action, whether it is an electrical transmission facility, a natural gas pipeline, or a mining action.

I would appreciate your assistance in helping federal agencies understand the significant local commitments that have been made in Pima County regarding conservation and request that federal agencies respect and honor our mitigation requirements of their proposed federal action.

If you or your staff would like additional information regarding these potential federal projects and their impacts to conservation systems, we would be happy to provide it.

Sincerely,

C.H. Huckelberry
County Administrator

CHH/anc

Enclosure

c: The Honorable Chairman and Members, Pima County Board of Supervisors

MEMORANDUM

Date: October 4, 2013

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

From: C.H. Huckelberry
County Administrator

Re: **County Open Space and Conservation Land Acquisition**

Introduction

Recently, an article in the *Arizona Daily Star* (Attachment 1) highlighted the County's acquisition of open space and raised issues regarding long-term management and maintenance of same. The issues raised are valid, and the story is accurate. However, unfortunately, mitigating impacts to County conservation lands are not solely the responsibility or the funding obligation of the County. In fact, the greatest threats to our conservation lands are now mainly from proposed federal actions.

Attachment 2 is a map that identifies the County's conserved lands – 103,000 acres in fee simple, as well as 137,000 acres of State Trust lands for which the County controls grazing leases. In total, the land conserved by the County is 240,000 acres.

Most Forecasted Adverse Impacts on County Conserved Lands Result from Proposed Federal Actions

Overlaying the attached map are the current and proposed federal actions related to mining, electrical transmission corridor development, and natural gas pipeline construction. Many of these actions cross existing County conserved lands or will significantly impact the County's ability to maintain and protect the biological resources for which the properties were acquired.

We have issued numerous letters of concern and formal comments to federal agencies regarding these adverse impacts, including the Federal Energy Regulatory Commission, the Bureau of Land Management, the Western Area Power Administration, the US Fish and Wildlife Service, the US Customs and Border Patrol, and the Coronado National Forest.

SunZia Southwest Transmission Project

Spanning approximately 560 miles, the SunZia Southwest Transmission project is a high-capacity electrical transmission project that proposes construction and operation of two

adjacent 500 kV electrical transmission lines from the proposed SunZia East Substation in Lincoln County, New Mexico to the Pinal Central Substation in Pinal County, Arizona. The Bureau of Land Management (BLM), the federal permitting agency for this project, proposes a preferred alternative route that has a segment that will bifurcate the San Pedro River Valley in the far northeastern corner of Pima County, impacting ecologically valuable lands near the San Pedro River, one of the last free-flowing rivers in the Southwest. The County has spent $13.9 million of voter-approved bond funds, conserving just over 61,700 acres. The transmission lines will predominantly cut through County- held State grazing leases associated with three large ranches acquired by the County. This project will:

- Impact a number of important conservation areas, wildlife travel corridors and archaeological sites where minor adjustments to the line footprint will not adequately mitigate potential impacts;
- Cut through major ranch roads, pastures and key use zones, which will hamper our operation and conservation ranching approach;
- Make lands much more accessible and remain open due to the need for transmission line repairs and maintenance, creating impacts that will continue for the County to address with no long-term support;
- Create disturbances during construction that are never fully mitigated;
- Significantly impact this area due to electric utilities having to clear vegetation under the path of transmission lines due to federal rules for reliability standards; and
- Impact the ability to use fire as an important vegetative management tool, especially for lands that are currently part of an active fire management zone, due to electric utilities restricting fire in utility corridors.

The BLM recently released the Final Environmental Impact Statement (EIS) for the SunZia project, largely ignoring the comments and concerns expressed by the County for the past three years.

<u>Sierrita/Kinder Morgan Natural Gas Pipeline</u>

El Paso Natural Gas (EPNG), subsequently purchased by Kinder Morgan, filed an application with the Federal Energy Regulatory Commission (FERC), the federal permitting agency for this project, for the construction and operation of the Sierrita Gas Pipeline project, formerly called the Sasabe Lateral project, a 60-mile long 36-inch diameter natural gas pipeline that will cut through the Altar Valley from an existing EPNG pipeline system just southwest of Tucson Mountain Park and south where it will terminate near Sasabe, Arizona and interconnect with an as of yet unconstructed pipeline in Mexico. The impacts cannot be understated. The County has conserved over 100,000 acres in the Altar Valley using $65 million in voter-approved bonds.

Since early 2012, the County has repeatedly advised and commented to EPNG and the FERC that if no other viable alternative route is possible, collocating the pipeline adjacent to State Route 286 is the most prudent route as opposed to routing the pipeline through the remote heartland of the Altar Valley west of the Buenos Aires National Wildlife Refuge. The County has also corresponded with our Congressional delegation and the US Department of Interior.

On March 12, 2013, the Board of Supervisors unanimously approved Resolution 2013-17 in opposition of the proposed western alignment of the Sierrita Pipeline project and to file a motion to intervene to become party to the proceedings. The construction of this west route through Altar Valley will:

- Increase illegal trafficking and smuggling activities and increase border security and law enforcement problems by essentially grading a 60-mile pipeline "de facto highway" in the remote and undeveloped area west of Sasabe. This is one of the primary areas where significant illegal immigration and smuggling activities have occurred over the past two decades and poses an increased threat to public safety.
- Degrade the conservation and habitat values of County conservation lands from increased trafficking and increased patrols by law enforcement.
- Increase land management costs to Pima County for our open space lands purchased by voter-approved bond funds due to vandalism and property damage by illegal activities in the area.
- Result in economic losses to ranchers who have invested time, money and personal resources in ranch infrastructure and livestock.
- Significantly compromise ongoing efforts in restoring the valley's watershed hydrological function, grasslands and natural ecology.

County staff have been involved in this project since 2011; and to date, more than 15 letters and reports noting our concerns have been sent to the FERC; Senator John McCain; Senator Jeff Flake; Congressman Raúl Grijalva; EPNG; the US Department of Homeland Security; Tohono O'odham Nation Chairman Ned Norris; the US Fish and Wildlife Service Southwest Region; the Buenos Aires National Wildlife Refuge; and the Arizona State Land Department.

<u>Western Area Power Administration (WAPA): Tucson–Apache Transmission Line</u>

WAPA plans to upgrade and rebuild approximately 120 miles of an existing 115 kV line from approximately Benson to north of Tucson. WAPA plans to replace 149 wood H-frame sets of paired poles and improve their access roads in Pima and Cochise Counties. County-owned conservation lands at Tumamoc Hill will be cleared of vegetation that has

grown up since 1950, and 12 sets of double poles will be removed with heavy equipment. Archaeological features are likely to be impacted as well as vegetation, yet WAPA has claimed their undertaking will not have an adverse effect to natural and cultural resources along the line. Pima County disagrees with this determination and continues to question their findings in correspondence dating from 2012.

- WAPA has not demonstrated they have a 100-foot easement.
- There is disagreement that there will be "no adverse effect" to historic properties from the WAPA project.
- Tumamoc Hill is both an NHL and a National Register Archaeological District; the Valencia Site is listed in the National Register; and the West Branch Site and other affected sites are eligible for listing.
- The WAPA line is not located "in the vicinity" of the Tumamoc Hill NHL and National Register Site; the WAPA line crosses through the Tumamoc Hill site.
- Tumamoc Hill is considered a traditional cultural place and sacred site by the Tohono O'odham Nation. Pima County finds that a determination of "adverse effect" is appropriate.
- An appropriate treatment plan to mitigate these impacts must prepared in consultation with the County, University, SHPO, tribes, the National Park Service, and other interested parties, and that it be implemented in advance of construction.

<u>Southline Transmission Project</u>

Southline Transmission, LLC filed an application with the BLM, the federal permitting agency for this project, to construct approximately 200 miles of a new double circuit 345 kV transmission line from the Afton Substation in Las Cruces, New Mexico to the Apache Substation south of Willcox, Arizona. In Pima County, the Southline project will follow the existing WAPA right of way and reconstruct this line to a much larger double circuit 230 kV transmission line between the Apache Substation and Saguaro Substation located northwest of Tucson. The County has invested $10.9 million conserving over 14,000 acres along this corridor. This planned high capacity line will adversely impact Tumamoc Hill and Davidson Canyon, as well as ranch holdings on the Bar-V ranch. County staff has been involved in this federal undertaking, and correspondence to date expressing our concerns has been sent to the BLM and to the Southland Transmission Company.

- Impacts from the Southline project will be far greater than those for the WAPA line reconstruction.
- Any mitigation for the WAPA line reconstruction will be insufficient for the Southline.
- Tumamoc Hill is both an NHL and a National Register Archaeological District; the Valencia Site is listed in the National Register and will be adversely impacted.

- Tumamoc Hill is considered a traditional cultural place and sacred site by the Tohono O'odham Nation. Pima County finds that a determination of "adverse effect" is appropriate.
- Arizona State Parks holds conservation easements on Tumamoc Hill and on the Valencia Site, which were purchased by Pima County with Growing Smarter matching grant funds in the amount of $1.64 million, and consultation with ASP is also necessary.
- An appropriate treatment plan to mitigate these impacts must prepared in consultation with the County, University, SHPO, tribes, the National Park Service, and other interested parties and that it be implemented in advance of construction.

Rosemont Mine

In July 2006, Augusta Resource Corporation submitted a mining plan of operation to the Coronado National Forest to develop a copper mine that would impact over 4,000 acres of public land in the Santa Rita Mountains. The mine would include an open pit, waste rock and dry stack tailings storage area, mine facilities, and utility roads. If constructed, this project will:

- Destroy over six square miles of functional ecosystem.
- Have direct impact on federally listed Threatened or Endangered species.
- Negatively impact Pima County's air quality.
- Irreversibly impact groundwater and rare riparian habitat in the Cienega Basin aquifer, where the County has spent over $64 million in protecting the ecosystems and water resources.
- Impact County-maintained highways.
- Impact over 100 prehistoric, historic, and traditional cultural and multicultural sites, nearly all of which have been deemed archaeologically or historically significant and eligible for listing in the National Register of Historic Places.

Pima County has been engaged in this project since 2006 and serves as a Cooperating Agency for the Forest Service's EIS for the Rosemont Mine. The County has been in continuous correspondence over the years, addressing County concerns with the Rosemont Mine and its impacts on our natural, cultural, and community resources. Pima County's last letter, dated August 14, 2013, contains 164 pages of detailed comments regarding the release of the Preliminary Administrative Final EIS. Many of the comments have been repeated and echoed in previous reviews of draft EIS releases and remain unaddressed by the Forest Service, including:

- The unmitigated habitat loss of over 4,000 acres, which would require around 12,900 acres of mitigation based on how the project affects the Conservation Lands System.
- Unclear mitigation requirements.

- No clear indications of local code compliance requirements.
- Inadequate mining reclamation plan.
- Failure to address environmental justice impacts.
- Little to no information provided on the financial assurances to be provided to offset the costs that would be incurred by taxpayers if the project causes conditions that endanger the public health.

The Board of Supervisors is well aware of my ongoing review and comment regarding the proposed Rosemont Mine action and the EIS for same, which is now under development by the US Forest Service.

All of these proposed federal actions not only impact our environmentally sensitive conservation land holdings and ranch lands on the periphery of Pima County, they also adversely impact significant scientific, historic and cultural assets such as Tumamoc Hill.

In fact, we believe many of our monitoring and maintenance obligations will result from federal actions as discussed above or as a result of ongoing unlawful border crossings and trafficking that are likely to increase with the construction of these pipeline conveyance and transmission corridors. We should not and cannot be held responsible for maintenance and monitoring obligations related to federal projects or federal policies.

We will continue to advise federal agencies of our concerns and request appropriate mitigation. In most cases, our requests and pleas for action or full reimbursement for adverse impacts fall on deaf ears.

<u>The County has Minimized Long-term Costs of Open Space Acquisitions through Ranch Management Agreements</u>

In almost all cases, the County has minimized the long-term operating and maintenance costs associated with open space acquisition by utilizing management agreements with viable ranching operators who continue to conduct livestock operations on County open space lands in accordance with conservation ranching standards and the terms of the individual ranch management agreements. These operators remain obligated to fund operating and maintenance costs associated with maintaining these ranch lands, such as security, fencing, water resource development, and day-to-day routine costs on those portions of County lands that they utilize as part of their ranching operations.

This model is entirely appropriate and reasonable, and has served the County, the ranching community and the taxpayers well. It will not be significantly altered in the future except

to evaluate the ongoing necessity of the ranchers to provide additional security and maintenance services on the County and grazing lease lands they help manage.

Multi-species Conservation Plan Obligations

The County has been in a multiyear process with the US Fish and Wildlife Service (Service) to develop a Multi-species Conservation Plan (MSCP). We are nearing the end of this process and will be in a position to negotiate a Section 10 permit with the Service. No one compels Pima County to get such a permit; it is an alternative, more efficient way to comply programmatically, rather than on a case-by-case basis, with the Endangered Species Act (ESA).

The County will very carefully review the financial obligations of this permit before entering into such an agreement, since the terms can vary widely, depending on the federal standards in effect at the time and the outcome of negotiations between the parties. We now understand the Town of Marana is attempting to either renegotiate or drop previously negotiated agreements concerning the mitigation for impacts to the cactus ferruginous pygmy-owl, since the owl is no longer federally protected.

The County will carefully review our obligations and ensure no double standards are being applied regarding receipt of our Section 10 permit for the County versus the obligations of a municipality in complying with the federal ESA.

Ultimately, the Section 10 permit is voluntary, unlike the federal actions previously discussed or the ongoing unlawful border crossings. New, involuntary needs for maintenance and monitoring are arising from federal actions to which Pima County is not a party. We should not and cannot be held responsible for maintenance and monitoring related to federal projects or federal policies imposed upon us.

The County's Open Space and Conservation Land Acquisition Program has been Financially Successful

The County, through voter authorized bonds in 1974, 1986, 1997 and 2004 has committed $250.7 million to open space acquisition and conservation land procurement. In total, 75,232 acres of fee lands have been acquired and 129,708 acres of State Trust grazing leases are now managed by the County and our ranch managers as a result of these bond programs.

This is a significant accomplishment, as it has had the intended policy effect of redirecting urban growth and expansion inward, arresting traditional urban sprawl, and making urban infill viable. Facilitating a more compact urban form is also fiscally more responsible by

maximizing revenues from existing infrastructure and services and by limiting the increased operations and maintenance costs associated with the expansion of sewers, roads, law enforcement, and other services provided by the County. In addition, the assets being protected and conserved are iconic from the perspective of facilitating and promoting tourism in the region, maintaining our rural communities and ranching economy, as well as protecting the ecosystems of the Sonoran Desert for the enhanced quality of life of future generations.

On the fiscal side, the simple fact that the County has acquired lands and created a Pima pineapple cactus mitigation bank has created an asset that today is worth between $2 and $5 million, depending on the value of individual credits that could be sold in the private market. It is clear that in managing the MSCP, other mitigation banks can be created for species that will inevitably be added to the Endangered Species List by future federal action, making our conservation and open space acquisitions even more valuable in the future.

Possible Future Management Costs

To venture a guess as to the estimated future management costs that taxpayers may incur in managing our conservation lands and open space acquisitions is just that – a guess. There is no hard evidence or science specifying exactly what will be necessary. There are no regulatory standards or requirements specifying a standard at this time; these are developed via negotiations between the permitting agency and Pima County. Funding for ecological monitoring, management, and maintenance is also clearly subject to annual appropriation of funds by the Board of Supervisors at budget adoption. Hence, while our burdens of maintenance and management of conservation and open space lands have been greatly increased because of potential federal actions approving projects that will have long-term negative impacts to our conservation lands, to quantify our future obligations is difficult, if not impossible, and nothing more than a guess.

Actual Cost to the County for Open Space Management Today

Today, the County spends $1,030,000, included in the Natural Resources, Parks and Recreation Department budget, to manage the A7 Ranch, as well as the natural resource management, open space and ranch management components of our significant open space acquisitions through County bonds. Given we now manage approximately 240,000 acres of lands for open space conservation or mountain park purposes, the annual cost to maintain the County's recently acquired open space inventory is in the range of $4.30 per acre per year. This is not an extraordinarily exorbitant expense.

I would expect this amount to increase in time as these natural open space assets of the County become increasingly used by the public.

CHH/mjk

Attachments

c: Martin Willett, Chief Deputy County Administrator
Hank Atha, Deputy County Administrator for Community and Economic Development
John Bernal, Deputy County Administrator for Public Works
Jan Lesher, Deputy County Administrator for Medical and Health Services
Nicole Fyffe, Executive Assistant to the County Administrator
Linda Mayro, Director, Sustainability and Conservation
Julia Fonseca, Environmental Planning Manager, Sustainability and Conservation
Jeff Nordensson, Director, Communications
Diana Durazo, Special Staff Assistant to the County Administrator
Kerry Baldwin, Natural Resources Division Manager, Natural Resources, Parks and Recreation

ATTACHMENT 1

County spent money to buy land but not care for it, so maintenance costs are piling up

SEPTEMBER 22, 2013 12:00 AM • BY BECKY PALLACK
ARIZONA DAILY STAR

You and a million of your neighbors got together years ago and bought some ranch lands to preserve the natural landscapes, wildlife and historical sites that make this area unique.

Your ranches are safe now from the threat of development. But your fence is broken, and you don't have time or money to fix it.

Trash is piling up in places you wanted to protect.

Scarce water resources need to be improved to help wildlife.

And the costs of fixing up and repairing the county's nearly 240,000 acres are growing fast.

Most of the county's land and grazing rights were bought with voter-approved bond money intended for conservation. Monitoring and management are needed both to protect that investment and to meet the federal legal requirements of the conservation programs.

But the bond money can only be used to buy property, not to manage it. Competing budget priorities have slashed funds meant for routine monitoring in half over five years, said **Kerry Baldwin**, manager of the county's Natural Resources department.

Money may not be available to replace signs or fences. A trail maintenance program was scrapped in favor of a sports park. And a rangeland staff position was vacant for more than a year before someone was hired recently.

"It makes headlines when you acquire a new piece of land, and that's great, but the responsibility doesn't end there," said **Brian Powell**, program manager for the county's Office of Sustainability and Conservation. "The leadership understands that. We've just been in a major downturn, so we're hopeful that we'll ramp back up and get the resources we need for those open-space areas."

To do that, the county must find money to monitor ecology, maintain infrastructure and manage people and resources on the lands.

ATTACHMENT 1

Ranchers who lease county land are required to keep an eye on security and maintain any wells and fences they use in their cattle operations. But they're not expected to clean up after border crossers or make improvements for wildlife and recreation users, Baldwin said.

County Administrator **Chuck Huckelberry** says maintenance and monitoring expenses will come out of the general fund, although skeptics want to see a dedicated pot of money. The county also will need to win grants and partner with state and federal agencies.

Another option is to create a volunteer corps to do conservation projects. "People protect what they know and love and are invested in," Powell said.

all types of users

During the real estate boom, land prices were rising quickly and ranches were attractive to developers, so there was a sense of urgency to buy and protect as much land as possible, said **Thomas Sheridan**, who has served on citizen advisory committees since 1997 and helped recommend purchases to the Board of Supervisors.

"The key was to keep these properties from getting developed," Sheridan said. "Almost anything is better than that."

During the recession, taxpayers got some great prices.

But there is a mishmash of uses and management on open-space lands. Ranchers, recreationists, smugglers and Border Patrol officers all use the same areas. You're as likely to see cattle tracks as ATV tracks in a sandy wash.

"There are all kinds of stresses that we put on these lands, and somebody has to pay attention to that," said **George Ruyle**, a University of Arizona range management professor who has served on citizen advisory committees for the Sonoran Desert Conservation Plan.

Often times it's less about managing land than managing people, Sheridan said. Irresponsible people steal or shoot metal signs, leave gates open, dump trash, disrupt wildlife and cut new roads with off-highway vehicles.

All that has led to a long list of repair and improvement projects that need to get done, Baldwin said.

"We're not able to do the preventative maintenance on wells and windmills. We have thousands of miles of barbed-wire fences around our ranches that are old and they need replacing. ... There are water holes that are silting in that are now no longer effective," he said.

Old, collapsing mines need to be made safe, and bat-friendly gates need to be installed at cave entrances.

Additionally, responsible recreation users need better access to these public lands. Roads need to be maintained. Gates need to be replaced with cattle guards, and new trailheads need to be built.

ATTACHMENT 1

There are 25 to 30 projects on a wish list just for the Tres Dedos ranches, county-owned properties near Amado.

On a recent morning after a monsoon rain, a trailhead at Tres Dedos was full of poppies, morning glories and young grasses that will be next year's grazing opportunities. There were also four empty beer cans, a beer bottle, a soda can, a plastic water bottle, a baby wipe, a dental floss pick, a broken hotel pen and a chunk of scrap metal — just at the entry gate.

At a site where the county installed a wildlife watering hole near a well, a solar panel that powers a pump needs repairing; the cover blew off a water tank, and litter needs to be picked up. Projects like these will take a month or two to get to, Baldwin said.

At least seven other wells at this ranch could be converted to solar and improved to help wild animals.

Some projects are much more complex. An old adobe ranch house is crumbling. The building is being used by bats, bees, squirrels, pack rats and sometimes by desperate people.

MONITORING is essential

One challenge with conservation plans is keeping an eye on the results, said **Carolyn Campbell**, executive director of the Coalition for Sonoran Desert Protection.

"We can buy all the lands that we can and all the lands that we want," she said, "but if we're not out there checking to see if the species are doing OK and the habitat is functioning ... then what do you do?"

The county isn't doing a lot of that checking now. Officials have worked with ranchers to do annual inspections, and staff studied test plots in 2010 to gather baseline data on plants and animals, but they haven't analyzed that data yet, Powell said.

Soon the county will be legally required to do more in-depth ecological monitoring.

To meet the requirements of the Endangered Species Act, the county has to get a permit from the U.S. Fish and Wildlife Service as part of its conservation program. The application includes a plan for monitoring certain species for 30 years.

The county has a plan but won't implement it until it receives the permit. Federal agencies are reviewing Pima County's application now, and Huckelberry said he expects the county will receive its permit in six months to a year.

"We're kind of in a hurry-up-and-wait process," he said.

Once it has permission, the county needs to invest in remote sensors, cameras, weather stations and animal tags to collect scientific data, Huckelberry said.

"The more we know about the land, monitoring the assets, the better they can be protected," he said.

ATTACHMENT 1

Plans call for things like counting plants and animals, checking water conditions and checking for non-native species.

"We will be going out there and counting tortoises and Pima pineapple cactus and cuckoos," Powell said. "There's a host of species we will be monitoring."

HOW TO PAY FOR IT

Opinions about how to pay for monitoring and managing the lands vary widely.

The county's Natural Resources, Parks and Recreation department, which is responsible for the work, proposed creating a Conservation Lands Management Program last year, but the request wasn't funded.

The department asked for about $1 million a year for the first three years of the program. The proposal said ecological monitoring would cost about $220,000 a year and managing cultural resources would cost about $160,000 a year for the first three years.

Department leaders wanted the county to consider new developer fees and use permits to pay for the program. But Huckelberry said he doesn't want new fees.

Open space benefits the whole economy, so it shouldn't fall to developers to pay for it, he said. Besides, fees would be too expensive for developers and too legally challenging for the county, he said.

He wants the money to come from the county's $460 million general fund. Monitoring will cost around $200,000-$600,000 a year, he said.

A previous county report estimated the annual cost at $990,000 a year, plus startup costs, but Huckelberry said that has been revised downward because improvements in technology have made monitoring less expensive.

He said the costs could be offset by new revenue from tourists who come to Pima County to visit the new public lands to learn about the Sonoran Desert.

The monitoring work will help identify special attributes of the lands, which could then be used to market the uniqueness of our area to these so-called ecotourists, he said.

He said future bond money could be used to pay for trailheads, parking and other improvements for "getting the public access to their lands."

Ranchers' contracts could include more ecological monitoring work in the future, too.

"Some people might think that's the coyote guarding the chicken house, but there would have to be oversight," Ruyle said.

Volunteers could help, too, Powell said.

Some want a dedicated fund to pay for the monitoring work.

Competition is high for general-fund dollars, Campbell said, and the Board of Supervisors must decide how to spend those dollars depending on the emergencies and political priorities of the time.

ATTACHMENT 1

"Finding an assured funding source is a really important issue to us," she said, and the U.S. Fish and Wildlife Service requires assured funding as part of the permit application.

Her coalition has proposed funding ideas including fees, an endowment, a local lottery, spending a portion of bed tax income.

Wherever the money comes from, its impact will be profound, Baldwin said.

"We're making an investment that's really going to pay off 30, 50, 100 years from now," he said. "'cause they're not going to make any more land. And it is our responsibility to make good decisions about land management today."

Volunteers filling in

Partnerships with volunteer groups are key to making open-space projects happen with limited county funds.

Volunteers have removed more than 200 tons of trash from county open-space lands over five years, said **Kerry Baldwin**, Natural Resources manager.

One group, the Arizona Antelope Foundation, is replacing broken fences with wildlife -friendly ones.

Pronghorn antelope are terrible jumpers, so when they come to a fence they typically go under, said **John Millican**, a foundation project manager and a former Arizona Game and Fish wildlife manager.

The bottom wire strands of standard livestock fences are too low, and that prevents antelope from moving into new grazing territory, he said.

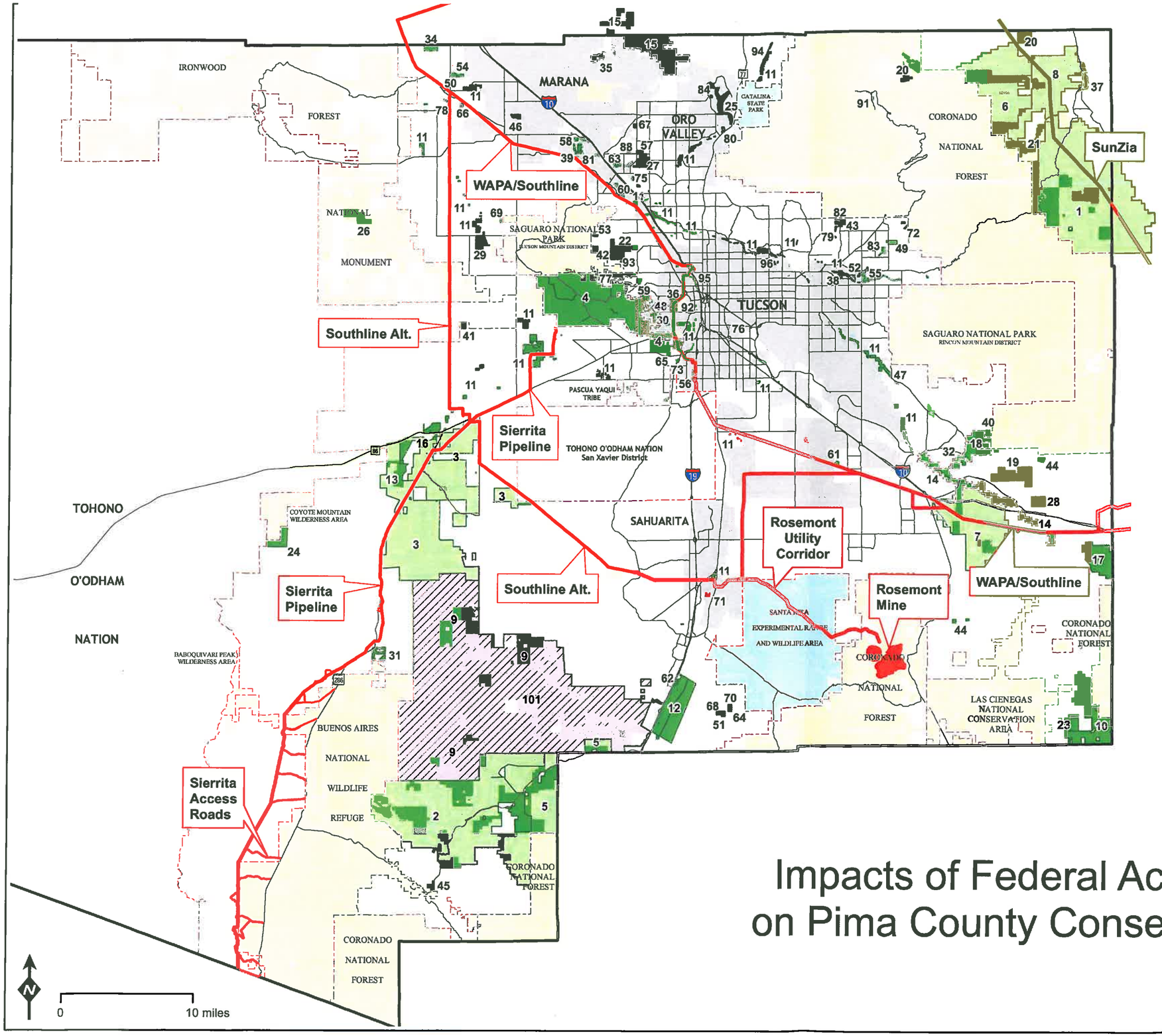
The foundation identified 15 miles of fence on the county's Empire Ranch alone that needed to be fixed, and Southwest Conservation Corps workers replaced all 15 miles.

Much more work needs to be done to restore the antelope's grassland habitat, Millican said, but "we wouldn't be able to do any of this without the different partnerships."

The fencing projects are made possible because the foundation, other private groups, the county, federal and state agencies, landowners, university scientists and volunteers all work together.

"It's really encouraging," Millican said, "and there's a lot of momentum right now and we need to keep that focus and keep people involved and seeing the importance of wildlife."

ATTACHMENT 2



Federal Action Projects

SunZia Southwest Transmission Project
Southline Transmission Project
Sierrita Gas Pipeline Project
Rosemont Mine

County Preserves

Fee Land or Conservation Easement
Grazing Lease
Marley Purchase Option (lease lands as hatch)

Incorporated Jurisdiction
Administrative Boundary
State Preserve
Federal Preserve

October 4, 2013

Impacts of Federal Action Projects on Pima County Conservation Lands

Map ID	County Preserve Name	Acres
1	A7 Ranch	41,252.0
2	Rancho Seco	37,113.2
3	Diamond Bell Ranch	30,757.7
4	Tucson Mountain Park	19,706.4
5	Sopori Ranch	15,485.2
6	Six Bar Ranch	13,602.4
7	Bar V Ranch	13,494.3
8	M Diamond Ranch	10,201.6
9	Marley Ranch	6,348.0
10	Sands Ranch	5,033.5
11	FLAP (multiple sites)	4,900.9
12	Canoa Ranch	4,853.9
13	King 98 Ranch	4,330.2
14	Cienega Creek Natural Preserve	4,267.8
15	Tortolita Mountain Park	3,924.8
16	Buckelew Properties	3,035.2
17	Empirita Ranch	2,713.6
18	Colossal Cave Mountain Park	2,219.0
19	Cienega Corridor	1,686.9
20	Oracle Ridge	1,173.4
21	Buehman Canyon	1,050.3
22	Sweetwater Reserve	890.8
23	Clyne Ranch	880.2
24	Old Hayhook Ranch	838.5
25	Honey Bee Biological Corridor	676.3
26	Lords Ranch	638.7
27	Arthur Pack Regional Park	513.1
28	Walden	447.3
29	Brawley Wash/Manville-Garcia	395.8
30	36th Street Corridor	373.5
31	Madera Highlands	373.3
32	Agua Verde Creek	353.9
33	Ajo	350.7
34	Drainageway	292.5
35	Cochie Canyon	286.0
36	Tumamoc	277.0
37	Bingham Cienega Natural Preserve	267.9
38	Tanque Verde Creek	216.6
39	Los Morteros	210.0
40	Rancho Del Cielo	162.4
41	Bee	160.2
42	Andrada	158.0
43	Segurson Donation	150.8
44	Southeast Corridor	141.4
45	Arivaca Open Space	122.1
46	Lower Santa Cruz Replenishment	104.6
47	Rocking K	103.6
48	Starr Pass Resorts Easements	103.1
49	Roy Drachman Agua Caliente Regional Park	100.6
50	Trico	96.6
51	Elephant Head Sec.15 Mit. Lands (Kreutz)	79.2

Map ID	County Preserve Name	Acres
52	Tanque Verde & Houghton Partners LLC	77.7
53	Malcolmson Donation	73.8
54	Marana Cottonwoods	72.5
55	Terra Rancho Grande	72.1
56	Valencia Site	68.2
57	PCDOT Mitigation Land	67.8
58	Avra Valley I-10 Wildlife Corridor	66.2
59	Dos Picos	55.8
60	Cultural Resource Parcel	54.1
61	Southeast Regional Park	52.8
62	Canoa Ranch Phase II	52.5
63	Cortaro-Hartman	49.0
64	Elephant Head Sec.15 Mit. Lands (Easely)	43.8
65	Manzanita Park Extension	40.4
66	Park?	40.2
67	Esther And David Tang	40.1
68	Elephant Head Sec.15 Mit. Lands	39.9
69	Picture Rocks District Park	37.9
70	South Wilmot LLC	35.5
71	Robson Quail Creek Parcel	28.7
72	Agua Caliente Creek	24.4
73	Dakota Wash	23.0
74	Doucette	22.0
75	DOT Section 7	19.6
76	Habitat 36Th/Kino	19.4
77	Holden Donation	18.4
78	Reay Rezoning - Cls Off Site Mitigation	18.0
79	Bear Creek Ranch	17.8
80	Steam Pump Ranch	15.3
81	Continental Ranch Development, Llc	15.2
82	Sneed Parcel	14.0
83	San Domingo Flood Prone Area	14.0
84	Honey Bee Village Preserve	13.0
85	Treehouse	12.5
86	Robles Ranch	11.2
87	Tucson Mountain Park Biological Corridor	9.9
88	Linda Vista/Patrick Property	9.3
89	Mission & 36th Subdivision	7.6
90	Reid Parcel	7.3
91	Coronado National Forest	5.4
92	Mission Gardens	4.5
93	Lazy C Ranch Estates	3.3
94	CDO Hazard Mitigation	2.5
95	Dunbar School	2.5
96	San Pedro Chapel	2.2
97	Ina Overlook	1.1
98	Ajo Train Depot	0.9
99	Wal-Mart Conservation Easement	0.9
100	West Branch Santa Cruz	0.5
101	Marley Purchase Options	97,573.9

Federal Action Projects that will Directly Impact County Conservation Lands

SunZia Southwest Transmission Project

The Bureau of Land Management is the federal permitting agency for the SunZia project. This transmission project spans 560 miles from New Mexico to Arizona and proposes to cross the far northeast corner of Pima County through the San Pedro Valley. The transmission line will predominantly cut through County-held State grazing leases associated with three large ranches acquired by the County using voter-approved bond funds. Impacts will include:

* Cutting through major ranch roads, pastures and key use zones which will hamper our operation and conservation ranching approach
* Make lands much more accessible and open for transmission line repairs and maintenance, creating impacts that will continue for the County to address with no long-term support
* Serious impacts to the ecology of the area due to electric utilities having to clear vegetation under the path of transmission lines due to federal rules for reliability standards
* Impact a number of important conservation areas and public investment, wildlife habitat and archaeological sites where minor adjustments to the line footprint will not adequately mitigate potential impacts

Southline/Western Area Power Administration (WAPA) Transmission Line

The Bureau of Land Management is the federal permitting agency for the Southline/WAPA Transmission project. This project is two-fold. The WAPA/Southline Transmission, LLC project plans to upgrade and rebuild approximately 120 miles of an existing 115-kV line and to construct approximately 200 miles of a new double circuit 230-kV line from approximately Benson to northwest Tucson. This planned high capacity line will significantly adversely impact Tumamoc Hill and Davidson Canyon as well as County ranch holdings on the Bar V ranch. This project will impact:

* Tumamoc Hill, which is both an NHL and a National Register Archaeological District, and is also considered a traditional cultural place and sacred site by the Tohono O'odham Nation; the Valencia Site, which is listed in the National Register
* Our agreement with Arizona State Parks, since they hold a conservation easement on Tumamoc Hill and the Valencia Site, which were purchased by Pima County with State Parks Growing Smarter matching grant funds
* The need for an appropriate treatment plan to mitigation these impacts which will need to be prepared in consultation with the County, University, SHPO, tribes , the National Park Service and other interested parties, and implemented in advance of construction

Sierrita Gas Pipeline Project

The Federal Energy Regulatory Commission (FERC) is the federal permitting agency for this project. El Paso Natural Gas/Kinder Morgan filed an application to construct and operate a 60-mile long, 36-inch diameter natural gas pipeline that will cut through the Altar Valley from an existing EPNG pipeline system southwest of Tucson Mountain Park all the way south where it will terminate near Sasabe, Arizona, where it would then interconnect with an as of yet unbuilt pipeline in Mexico. The impacts through this remote and pristine area cannot be understated. Impacts from the west route alignment will:

* Increase illegal trafficking and smuggling activities and increase border security and law enforcement problems by essentially grading a 60-mile pipeline "de facto highway" in the remote and undeveloped area west of Sasabe.
* Degrade the conservation and habitat values of County conservation lands from increased activity on these lands
* Increase land management costs to Pima County for lands purchased with voter-approved bond funds due to vandalism and property damage by illegal activities in the area
* Significantly compromise ongoing efforts in restoring the valley's watershed hydrological function, grasslands and natural ecology
* Result in economic losses to ranchers who have invested time, money and personal resources in ranch infrastructure and livestock

Rosemont Mine

The Forest Service is the federal permitting agency for this project. Augusta Resources Corporation submitted a mining plan of operation to the Coronado National Forest to develop a copper mine that would impact over 4,000 acres of public land in the Santa Rita Mountains. The mine would include an open pit, waste rock, and dry stack tailings storage area, mine facilities and utility roads. If constructed, the project will:

* Destroy over 6 square miles of functional ecosystem
* Have direct impact on federally listed Threatened and Endangered Species
* Negatively impact Pima County's air quality
* Irreversibly impact groundwater and rare riparian habitat in the Cienega Basin aquifer, where the County has spent over $64 million in protecting the ecosystems and water resources
* Impact County-maintained highways
* Impact over 100 prehistoric, historic and traditional cultural and multicultural sites