



Novak Environmental, Inc.
4574 North First Avenue
Suite 100
Tucson, AZ 85718
Phone 520-206-0591
Fax 520-882-3006

September 8, 2009

Ms. Carla Danforth
Pima County Regional Flood Control District
97 E. Congress, 2nd Floor
Tucson, AZ 85701

Subject: Comment on Riparian Habitat Mitigation Standards and Implementation Guidelines – July 2009 Draft

Dear Carla:

I have had an opportunity to review the current draft of the Riparian Habitat Mitigation Standards and Implementation Guidelines (Guidelines) dated July 2009. These Guidelines represent a significant effort and I understand they are the result of a lengthy process which has included input from a work group as well as the general public. I have appreciated the opportunity to participate in this effort and have previously provided my thoughts and input based on my background working for the Flood Control District for eight years, as well as from my experience in private practice the past twelve years.

My comments are few and focused on a couple of key areas which I feel need more clarification. I would like to see that the process for developing mitigation plans, based on the new Guidelines, maintains the ability for qualified RFCD staff to evaluate and make determinations for each project on a case by case basis – as is done today.

Comment Area: Methods of Vegetation Survey

The two methods included in the Guidelines – Total Vegetation Volume (TVV) and Plot Sampling should be clearly presented as being equally acceptable to the RFCD. This should be a clear statement at the beginning of the section describing these methods.

Additionally, there are many sites where sampling is not necessary – because a site is small enough to warrant a full survey. In these cases a 100% survey using the same counting method as plot sampling should be clearly and expressly included as an option.

Comment Area: Development of Mitigation Plans

When the TVV method is used – where are the guidelines for translating this information back to quantities of trees and shrubs? Ultimately, a riparian mitigation plan is a “planting plan” which needs to provide these quantities.

Comment Area: Requirements for Riparian Habitat Boundary Modification (Technical Procedure 116)

Why is the information on soil classifications needed? The information available on the internet is mapped at such a general level, it is may or may not apply to a specific site.

Will this information make a difference in any boundary determinations? If not, this is just extra information that is over and above the detailed plant information that is also required. While it will not take a significant amount of time to include (maybe an extra 1-2 hours for research, translating information into a CADD file, adding to plans, etc.) it does add to the overall cost of the effort. Please remove this item from the list of information to be included on an exhibit.

Thank you for your consideration of these comments. I am available to discuss these further.

Sincerely,

A handwritten signature in cursive script that reads "Karen M. Cesare".

Karen M. Cesare, RLA
President
Novak Environmental, Inc.