



Southern Arizona Home Builders Association

Southern Arizona Home Builders Association

2840 N. Country Club Road
Tucson, Arizona 85716
Phone: (520) 795-5114
Fax: (520) 326-8665
Web: www.sahba.org

President

Edward P. Taczanowsky

2009 Executive Officers

Chairman

Steven Washburn
Washburn Custom Builders

First Vice Chairman

Michael Whyde
Pepper-Viner Homes

Second Vice Chairman

Ed Castelhano
Becklin Construction

Secretary

Martha Wright
Southwest Gas Corporation

Treasurer

John Shorbe, Sr.
Canoa Development, Inc.

2008 Past Chairman

Randy Agron
A. F. Sterling Home Builders

Legal Counsel

John E. Kofron
Fennemore Craig



March 20, 2009

Carla Danforth
Pima County Regional Flood Control District
Water Resource Division
97 E. Congress, Second Floor
Tucson, AZ 85701

Dear Carla:

The Southern Arizona Home Builders Association (SAHBA) has been a stakeholder in the process to revise the Regulated Riparian Habitat Mitigation Standards and Implementation Guidelines for many months. We appreciate the opportunity to engage in this process and have provided our comments and questions on the most recent draft found below.

Mitigation Standards & Requirements

1. There should be greater flexibility for large phased projects. 14,520 sq. ft. or 1/3 of an acre of disturbance as the trigger for large projects is excessively low. We would like to work with you to determine an appropriate percentage of total regulated habitat as the trigger.
2. Off-site mitigation scenarios, requirements and ratios must be clearly detailed for each habitat classification. Consideration should be given for mechanisms/ratios for mitigating one classification with another. Consideration should be given for using off-site mitigation to enhance existing effluent fed streams to speed habitat establishment, expansion and density.
3. There should be a reduction of calculation of in-lieu fees – cost and delivery of nursery grown replacement material, installation of plants and irrigation is more expensive than raw land acreage.
4. The requirement for a 100% inventory of riparian acreage could be impractical and costly. Representative sampling for large areas should be an option. Plant inventory should be for mature plants only and not seedlings without proven viability or survivability.
5. There should be the ability to utilize all of the 30% set-aside for compliance with NPPO for Riparian Areas without additional upland NPPO required.
6. Going to the Board of Supervisors for approval for mitigation plans and in lieu fees for Habitat C and D is unnecessarily time consuming. Staff should have the ability to do this.

Carla Danforth
page 2
March 20, 2009

7. Is the 'Q' of a designated Important Riparian Area (IRA) important? Is a 'Q' of greater than 2000 cfs a threshold?
8. If all contributing Xeroriparian washes to an IRA are eliminated the conservation value is minimized. Is IRA designation intended to provide "habitat preservation"? Is it intended to provide "watershed function protection"?

Maps & Designations

9. It is stated that Important Riparian Areas and Xeroriparian Class D are based on Total Vegetation Volume. But it is our understanding they are actually based on aerial photography. Are the determinations made by TVV or aerial photography? If based on TVV, can we have a copy of the data?
10. There must be the ability to easily adjust the mapped boundaries (including for IRA), and modify the qualitative grade of the habitat based upon what is actually on site. The process should be fair and clearly defined.
11. Some large (2000-5000 cfs) washes on the Pima County MapGuide are not shown on the SDCP MapGuide maps. This is an omission that should probably be corrected.

Thank you for the opportunity to provide input. We look forward to working with you to finalize the guidelines.

Sincerely,



David Godlewski
Government Liaison, SAHBA