



Villages at Vigneto proposed development

Talking Points:

- Benson officials **should not** approve the Final Community Master Plan until: **1)** Phase III USGS hydrogeologic model is completed and used to inform decision making processes related to the development of groundwater resources and associated impacts to the community and ecosystem (draw-downs of private wells, projected subsidence, loss of springs and seeps, impacts to river base flows, etc.) **2)** The Army Corps of Engineers has re-evaluated and/or re-approved the Section 404 permit for Vigneto and has formally consulted with the U.S. Fish and Wildlife Service regarding impacts to threatened and endangered species; **3)** Federal and state agency consultations and recommendations have been fully integrated into Vigneto's scale, design and configuration.
- Vigneto poses a significant potential threat to the San Pedro River, two Global Important Bird Areas and a hemispherically vital bird migration corridor.
- As conceived, Vigneto is too large and water-intensive to be sustainable. Vigneto should be significantly down-scaled consistent with the very arid environment in which it is proposed.
- Benson's General Plan States: "The San Pedro River corridor has been identified as one of the City of Benson's key amenities, and its protection is viewed as one of the community's highest priorities." However, the Benson City Council has not made the protection of the river a high priority. The Council has not taken any tangible steps to ensure the extensive groundwater mining proposed by Vigneto will not dry up the San Pedro River: its key community resource.
- In 2008, the City of Benson was issued a 100-year water adequacy determination by the Arizona Department of Water Resources (ADWR) that would ostensibly cover Vigneto. However, ADWR does not consider the health of a nearby river when they make their 100-year water adequacy determination. Nor do they take into account impacts to federal reserved water rights, which is the basis for the lawsuit challenging the water adequacy determination issued to the proposed Tribute development in Sierra Vista.
- A recent hydrological study conducted by Integrated Hydro Systems found that the amount of groundwater pumping proposed by Vigneto will lower the water table at St. David Cienega by 1.5 feet, independent of drought and climate change. Not only could St. David Cienega be dried up by Vigneto's groundwater pumping, this extensive pumping is also projected to significantly decrease base flows of the San Pedro River itself.
- Vigneto is forecast to increase demand on groundwater resources from approximately 800 to as high as 13,000 acre-feet per year, potentially depleting surface and subsurface streamflows of the San Pedro River and impacting the world class wet-cave system at nearby Kartchner Caverns State Park. Given the arid environment, drought and potential impacts, Benson should require Vigneto to be a "net zero water building" development.

- Kartchner Caverns is a major source of income for Benson. Vigneto should be required to proactively mitigate any impacts to Kartchner Caverns in order to protect the wet-cave system and the City of Benson's interest in maintaining the viability of this tourist destination.
- Vigneto should be required to comply with Dark Skies night lighting standards, both to preserve the area's amazing dark skies and to protect the valley's bird migratory corridor from dangerous light pollution.
- Vigneto may increase stormwater runoff, flooding and sediment accumulation and transport in the river. The Vigneto CMP should not be approved before the Clean Water Act Section 404 permit has been re-evaluated and consultation regarding impacts to threatened and endangered species occurs. Changed circumstances and new information related to Vigneto require the Army Corps to re-evaluate the project's 10-year old Clean Water Act 404 Permit, and to formally consult with the U.S. Fish and Wildlife Service. Consultation may require modifications to the project in order to protect listed species. Benson should know what these impacts are, and ensure their avoidance before approving the final CMP.
- Vigneto threatens the sustainable world-renowned birding and nature-based economy of the San Pedro River Valley. The total economic effect from 2011 watchable wildlife activities in Arizona was estimated at \$1.4 billion. In 2011, watchable wildlife in Cochise County generated \$14,190,743 in retail sales with a total multiplier effect of \$24,130,389. In Cochise County alone, watchable wildlife created \$7,651,115 in salaries and wages, supported 234 full and part-time jobs; generated \$1,570,931 in state and local tax revenues and \$1,769,276 in federal tax revenue.
- More meaningful conservation features should be integrated, including: protection of sensitive wildlife habitats and sufficiently wide wildlife corridors (1 km minimum); residential and commercial rainwater harvesting; high efficiency appliances and composting toilets; dispersed rooftop and parking lot solar energy production; use of native vegetation only and avoidance and management of non-native invasive plant and animal species; dark-skies compliant night lighting. Where impacts to wash systems are unavoidable, low impact development techniques should be employed, including the use of permaculture techniques and recharge basins. Comments on the CMP related to these topics from Tucson Audubon (**January 29, 2016** and **November 25, 2015**) and the Arizona Game and Fish Department (**October 30, 2015**) should be fully addressed.