

Send to Kathleen.A.Tucker@usace.army.mil or address below

Department of The Army
Los Angeles District, U.S. Army Corps of Engineers
Regulatory Division
Attn: Kathleen Tucker
3636 N Central Avenue, Suite 900
Phoenix, Arizona 85012-1939

Dear Ms. Tucker,

Thank you for the opportunity to comment on the Army Corps of Engineers' re-evaluation of Clean Water Act (CWA) Section 404 (33 U.S.C. § 1344) Permit number 2003-00826-SDM (Villages at Vigneto). I request that the Corps revoke Permit number 2003-00826-SDM and conduct a full Environmental Impact Statement (EIS) regarding the potential impacts of the Villages at Vigneto (Vigneto) development.

I write as a concerned citizen and as someone who appreciates the beauty, health, function and values of the San Pedro River, which would be drastically, adversely impacted by this massive, unprecedented development.

I love Arizona and the quality of life provided by a clean environment, beautiful open space and the peace of the great outdoors. I disagree with the applicant's claim that no Environmental Impact Statement is required. The currently suspended 2006 Permit is based on an inadequate and inaccurate analysis of an entirely different project (the Whetstone Ranch proposal). The newly proposed Vigneto development is over 4,000-acres larger than the Whetstone Ranch proposal, includes the potential to grow by an additional 2,000-acres on top of that (almost doubling the size of the prior Whetstone Ranch proposal), and would fragment 12,817 acres of high desert grasslands and inter-braided washes southwest of Benson, AZ (almost 20 square miles). The increase in size and scope of the current proposal poses significant impacts to the environment that must be thoroughly analyzed and disclosed in an Environmental Impact Statement ("EIS").

Preparing an EIS will ensure that the public is provided with a meaningful opportunity to comment on the significant environmental impacts of the project. So far, the Corps has not provided the public with any environmental analysis of the Villages at Vigneto development. I am dismayed by the lack of information, which hinders my ability to meaningfully comment on the Corps' analysis and help the agency reach an informed decision.

In addition, I am disturbed at the Corps' failure to engage in formal consultation with the U.S. Fish and Wildlife Service regarding potential impacts to, and mitigation for, any threatened or endangered species and/or critical habitat designations within, adjacent to, or impacted by activities on the entire project site. I value and enjoy the biologically diverse habitats which the San Pedro watershed supports and would be disheartened to see it fragmented by such a massive development. Not only is this habitat critical for supporting a multitude of species, it is an important economic engine for ranchers, farmers and tourists such as wildlife watchers, hikers, sportsmen and many others. I do not believe Vigneto, in its current configuration, is in the public interest.

The San Pedro River is the last free-flowing river in the desert southwest. This watershed is the most biodiverse of any in the southwest, exceeding even the Middle Rio Grande. As all desert dwellers know, our ephemeral and intermittent streams are critical to our region's healthy hydrology. While facing an 18-year state-declared drought emergency, Benson and surrounding communities are dependent on the limited, precious surface water and groundwater which supports both people and the relatively intact, unfragmented environment. I request the Corps revoke Vigneto's suspended 2006 Permit and conduct an EIS to consider all direct, indirect, cumulative, interrelated and interdependent impacts to the entire 12,817 acres of the site AND potential off-site impacts resulting from the proposed development. In this arid region, water, and the diverse habitats and wildlife it supports, are the most precious resources.

Sincerely,

[your name and full address]