



Coalition for Sonoran Desert Protection

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Arizona Center for Law
in the Public Interest

Arizona League of Conservation
Voters Education Fund

Arizona Native Plant Society

Bat Conservation International

Cascabel Conservation
Association

Center for Biological Diversity

Center for Environmental
Connections

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Drylands Institute

Empire Fagan Coalition

Environmental and Cultural
Conservation Organization

Environmental Law Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro National
Park

Friends of Tortolita

Gates Pass Area Neighborhood
Association

Native Seeds/SEARCH

Neighborhood Coalition of
Greater Tucson

Northwest Neighborhoods
Alliance

Protect Land and
Neighborhoods

Safford Peak Watershed
Education Team

Save the Scenic Santa Ritas

Sierra Club-Grand Canyon
Chapter

Sierra Club-Rincon Group

Silverbell Mountain Alliance

Sky Island Alliance

Sky Island Watch

Society for Ecological
Restoration

Sonoran Arthropod
Studies Institute

Sonoran Permaculture Guild

Southwestern Biological
Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

Women for Sustainable
Technologies

Supervisor Ray Carroll and Members
Pima County Board of Supervisors
130 W. Congress St., 11th Floor
Tucson, AZ 85701

RE: Co9-13-09 Tanque Verde Road Rezoning

Dear Supervisor Carroll and Board Members:

Thank you for the opportunity to comment on the rezoning request for the proposed Desert Willow Ranch development (Co9-13-09 Tanque Verde Road).

On September 17, 2013 the Board of Supervisors approved a comprehensive plan amendment for the Desert Willow Ranch property and directed the applicant to work with Coalition representatives to achieve further conservation/mitigation on the property during the rezoning process.

The Coalition has had numerous meetings with the property owner and his representative since the Board hearing on the plan amendment, including a field trip to the property. As a result of these meetings and our input, the property owner has made changes in the proposal to bring the property closer to compliance with the CLS guidelines. These changes include:

1. The entire 122-acre property is now subject to the rezoning request, instead of the 53-acre portion approved for the previous Tentative Plat. This includes two SR lots on the northwest corner of the property and the adjacent ~60 acres of Important Riparian Area that will be deeded to Pima County Regional Flood Control District for preservation.
2. The disturbed area has been decreased on the housing units within the 49 platted lots and the two SR lots, with specific grading restrictions to be included in the Special Conditions and recorded as notes on the plat.

The Coalition is aware of the unique physical and procedural issues on this site. These include: 1) the County-constructed bank protection/spur dike along the Agua Caliente Wash, altering the flood flows out of a portion of Important Riparian Area land and out of the mapped floodplain, while Biological Core Management Area lands to be developed remain in the floodplain, 2) previous development that has degraded the site, and 3) approval of a subdivision Tentative Plat in March 2013 on a similar footprint to what is now proposed. It is also important to note that the property owner has an approved subdivision Tentative Plat secured in March 2013 for the property.

The changes that the Coalition has worked on with the property owner have resulted in ~80% open space set-aside in the Biological Core Management Area. The Important Riparian Area set-aside in the revised proposal still falls short of the 95% minimum open space guideline as

per the CLS; however, the current proposal includes enhancements to riparian habitat on-site that, with the Coalition's oversight, will hopefully lead to richer and more functional habitat in the future.

On January 29, 2014 the Planning and Zoning Commission recommended approval of the conditions listed in the staff report by the Regional Flood Control District and Environmental Planning staff, and with the following additional Special Conditions:

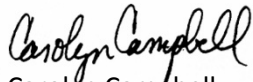
- The property owner will work with staff and the Coalition for Sonoran Desert Protection regarding outdoor lighting and the plant palette for the enhanced vegetation in the Riparian Habitat Mitigation Areas and issues related to facilitating wildlife movement throughout the property, including across the entrance road. (Condition 16)
- Common open space will be maximized between the building envelopes and the Agua Caliente wash on lots 1-23. (Condition 17)

The Coalition will support this rezoning request, with one additional Special Condition:

- **Free-ranging domestic animals will be prohibited in the subdivision, by placing a restriction as such in the Covenants, Conditions and Restrictions (CC&Rs).**

Thank you again for the opportunity to comment on this rezoning application. If you have any questions, please do not hesitate to contact me.

Sincerely,



Carolyn Campbell
Executive Director

Cc: Arlan Colton, Pima County Planning Director
Terri Tillman, Senior Planner
Sherry Ruther, Office of Sustainability and Conservation