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

Exhibit
I-D. 6b

April 30, 2015

Mr. Michael Marks, MJM Consulting
7002 E. 4th Street
Tucson, AZ 85710

Subject: Arizona Game and Fish Special Status Species Occurrence Statement – Shocket Property

Dear Mike:

I have reviewed the information contained in the results of the Arizona Game and Fish's "On-line" review for the approximately 6.9 acre parcel of land on N. 1st Avenue in Pima County.

The results returned show a total of 10 species of plants and/or animals that have some sort of special status as possibly existing within three miles of the subject property.

I have reviewed the list of species and compared the habitat requirements of each against the conditions found on the subject property.

It is important to note that within a three mile radius of the subject property there is Pusch Ridge, Pima Canyon and its protected riparian areas and lower elevations of the Catalina Mountains in the Coronado National Forest. This is mentioned as an explanation for the presence of many of the species listed in the results of the review.

With a few exceptions, there is no habitat on the subject property that could support the species listed. The species that may be found, but are not highly likely to be found on site include:

1. Opuntia versicolor, Stag-horn Cholla, which only listed as a state regulated species, and not observed on site even though there is a significant population of other Cholla species. No special treatment of this species is required should it be found.
2. Bat species, Mexican Long-tounged Bat, Lesser Long-nosed Bat, and the California Leaf-nosed Bat, were not observed on site. The site does not provide habitat conducive for roosting. It is, however, suitable for feeding due to the large population of columnar cacti they feed on. The Saguaro population will remain at or above the same population levels after development due to the Pima County Native Plant

Ordinance therefore the bat populations that may be in the area should not be adversely affected.

3. Tumamoca macdougalii, Tumamoc Globeberry, which is only listed as a state regulated species, was not found on site. The site is conducive to its growth patterns. No special treatment of this species is required should it be found.

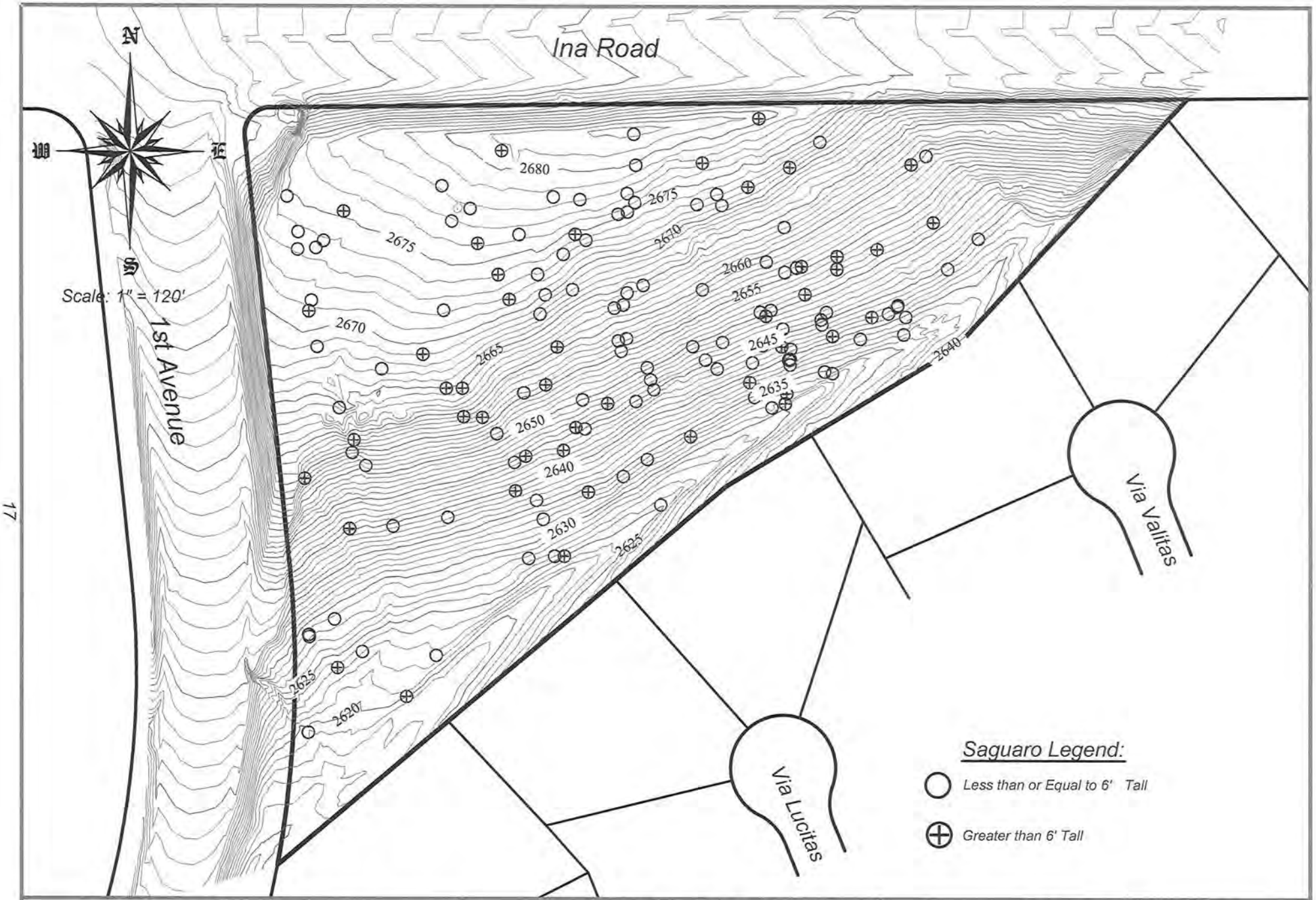
Please let me know if you have any questions or need more information.

Sincerely,

Karen Cesare

Karen Cesare, RLA
President

Exhibit
I-D.6b

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Schocket - Ina Road
APN: 108-05-1380
Section 6, Township 13 South, Range 14 S.
Pima County, Arizona

Exhibit I-D.7/9
Special Species Map

8. The property is not classified as Habitat Protection or Community Open Space by either the approved 2004 or the proposed 2015 Conservation Bond Program.
9. The visible areas of the site along the Ina Road and 1st Ave frontages provide marginal scenic values to motorists due to their apparent natural conditions. These slopes, at least a portion of them, are actually not natural and are the result of a cut condition performed in conjunction with prior roadway improvement projects. The re-vegetation effort along Ina Road has grown since the construction took place to the extent that it appears to be in a naturalistic state. The re-vegetation effort that took place along 1st Ave has not been successful. The cut slope on that side is actually in the right-of-way adjacent to the subject property, it has very little plant material on it, and shows signs of erosion. The drainage swale, between that cut slope and the 1st Ave roadway, is overgrown with non-native vegetation and is a catch-all for litter. When the site is developed, the Ina Road and 1st Ave sides as well as the southeast border will be subject to Pima County ordinance 18.73 Landscaping, Buffering and Screening Standards.
10. Exhibit I-D.10, i.e. the Vegetative Communities Map, shows the majority of the property to be located within the Sonoran Desert Upland, Mixed Palo Verde/ Saguaro plant community (approximately 52% of the total site). It shows another area designated as 'High Concentration Ocotillo Area' (approximately 31% of the total site), technically a sub-set of the Sonoran Desert Upland, Mixed Palo Verde/ Saguaro plant community. The Sonoran Desert Upland, Mixed Palo Verde/ Saguaro plant community primarily consists of Foothills Palo Verde, Saguaro, Jojoba, Cholla cactus of varying species and prickly pear of varying species. The balance of the site consists of a Previously Disturbed Area (approximately 8% of the total site) and an Un-Regulated Riparian Community (approximately 9% of the total site). The latter community is located along the southeast border overlaid on top of the no-name wash. The un-regulated riparian community primarily consists of Blue Palo Verdes with a smaller number of Velvet Mesquites, Catclaw Acacias, and Desert Hackberries. The Desert Hackberry population is solely located in the south eastern corner of the property where the 1st Ave drainage swale combines with the existing no-name wash.

## I-E. VIEWSHEDS

1. The Cluster Option will not be utilized and therefore this section will not apply.
2. See Exhibit I-E.2, for photos of the site, taken both on and off site.

## I-F. TRANSPORTATION

1. The property has direct access onto both Ina Road and 1st Avenue. Exhibit I-F.1 shows all roads designated by the Major Streets & Routes Plan (MS&R) within 1 mile of the subject property. They include the two abutting roads plus Orange Grove Road, and Oracle Road. Ina and Orange Grove Roads are 'Scenic Major Routes', 1st Ave is a 'Major Route', and Oracle Road is a 'Scenic, State or Interstate Highway'. Information is provided for each below.

   Ina Road

   a. The existing right-of-way varies although generally is a full 150 feet. Adjacent to the subject property it is 150 feet.
   b. The ultimate right-of-way per the Major Streets & Routes Plan is 150 feet. No additional right-of-way would need to be dedicated off of the subject property.
   c. The R/W is continuous to the west for 6 +/- miles to I-10 and beyond. To the east, Ina Road becomes Skyline Drive that then becomes Sunrise Drive which all together is continuous to Sabino Canyon Drive, about 9 miles away.
   d. There are no 'offsite roads' to discuss.

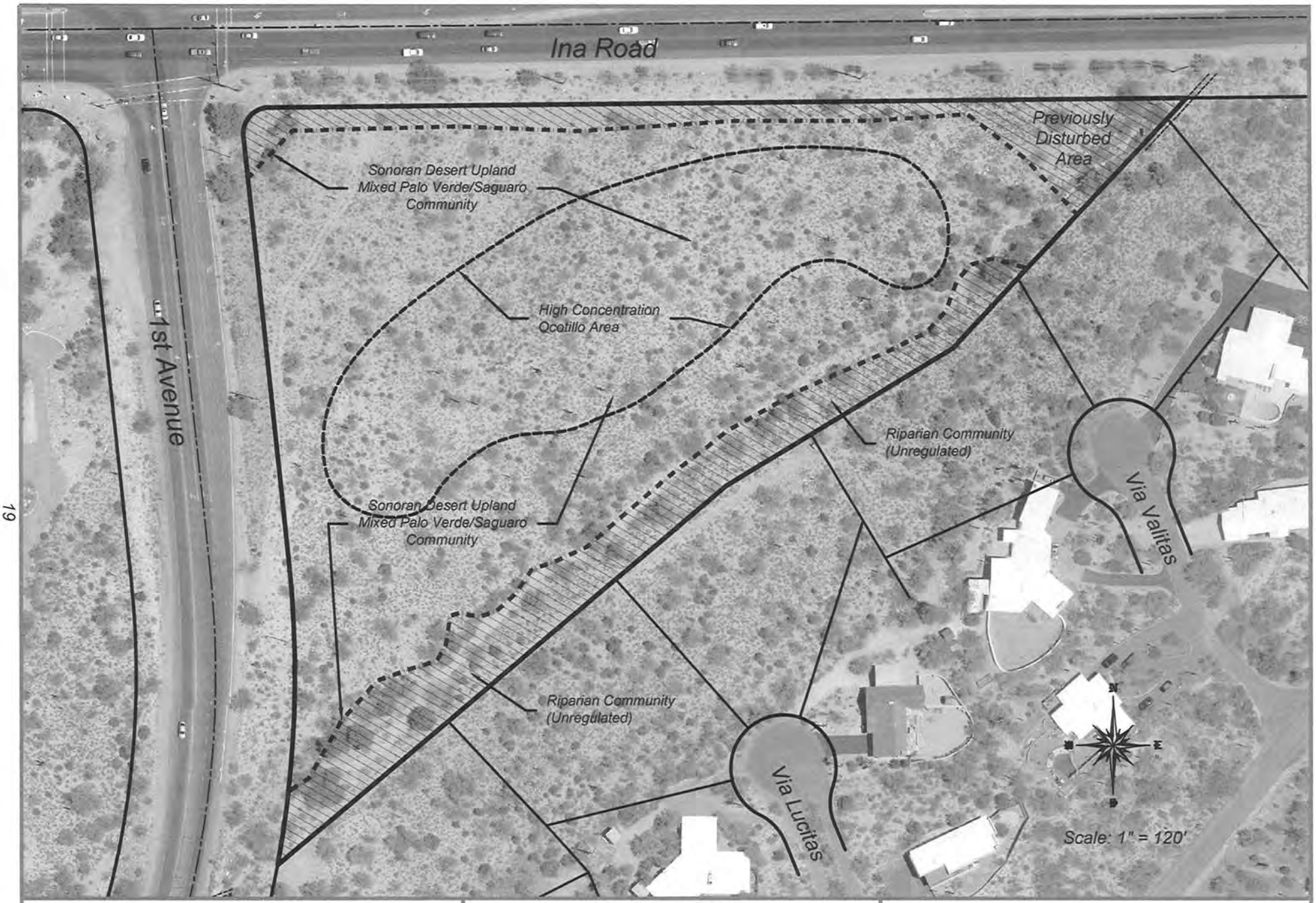


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Exhibit I-D.10
Vegetative Communities Map

*From the north looking southerly onto the site*

*Looking from the southeast looking onto the site*

*From the west looking easterly onto the site*

e. The roadway consists of two travel lanes on either side of a raised median. On the edge of both sides there are bike lanes and curbs but no sidewalks. At the 1st Ave intersection there are designated left & right turn lanes, for both the westbound and eastbound directions. The posted speed limit is 45 MPH. The capacity for such a roadway is 39,800 average daily trips (ADT).
f. According to PAG's online traffic volume records, Ina Road between Oracle Road and 1st Avenue has an average daily two-way traffic of 35,217 trips, based on a 2013 count.
g. There are bike lanes on both sides of the street but there are no pedestrian paths.
h. The Pima County 5 Year Transportation Improvement Plan (TIP) calls for improvements to Ina Road at the Oracle Road intersection, however those improvements are now completed.

1st Avenue

a. The existing right-of-way from Ina Road to the south is generally 150 feet in width as it is along the subject property.
b. The ultimate right-of-way per the Major Streets & Routes Plan is 150 feet. No additional right-of-way would need to be dedicated off of the subject property.
c. South of Ina Road, 1st Ave runs through the City, changes name to Euclid Ave and then Park Ave, and continues for over 10 miles. North of Ina Road 1st Ave is more of a local road and continues to Magee Road, about a mile to the north.
d. There are no 'offsite roads' to discuss.
e. The roadway consists of one travel lane on either side of a striped center left turn lane, with a bike lane on both sides. On the edge there are no curbs or sidewalks.. At the Ina Road intersection, northbound, there is a double left turn lane, a thru lane, and a right turn lane. The posted speed limit is 35 MPH next to the subject property, but further to the south it is 45 MPH. The capacity for such a roadway is 17,700 average daily trips.
f. According to PAG's online traffic volume records, 1st Ave between Ina & Orange Grove Roads has an average daily two-way traffic of 16,423 trips, based on a 2011 count.
g. There are bike lanes on both sides of the street but there are no pedestrian paths.
h. The Pima County 5 Year Transportation Improvement Plan (TIP) does not list any project for 1st Ave.

Orange Grove Road

a. The existing right-of-way, for the segment within 1 mile, is 150 feet in width.
b. The ultimate right-of-way per the Major Streets & Routes Plan is the same 150 feet.
c. Orange Grove Road starts at the intersection with Skyline Dr to the east about 1.3 miles and runs to the west of 1st Ave for about 5 miles to I-10.
d. There are no 'offsite roads' to discuss.
e. The roadway consists of two travel lanes and bike lanes on either side of a raised median. There are no curbs or sidewalks. There is a left turn lane at 1st Ave. The posted speed limit is 45 MPH. The capacity is 16,700 average daily trips (ADT).
f. According to PAG's online traffic volume records, Orange Grove Road, between Oracle Road & 1st Ave, has an average daily two-way traffic of 22,456 trips, based on a 2013 count.
g. There are bike lanes but no pedestrian paths along the roadway.
h. There are no roadway improvements planned per the Pima Co 5 Year Transportation Plan.

Oracle Road (only the area at & near the Ina Road intersection)

a. The existing right-of-way varies from about 130 to 200 feet wide.
b. The ultimate right-of-way is not determined by the Major Streets & Routes Plan as it is a State Highway.
c. Oracle Road is continuous from Tucson north to northern Arizona.
d. There are no 'offsite roads' to discuss.
e. The roadway consists of three travel lanes, striped bike lanes, and dirt shoulders on both sides of a raised median. On the outside there are no curbs or sidewalks. The posted speed limit is 45 MPH. The capacity is 59,900 average daily trips (ADT).
f. According to the Pima County Department of Transportation traffic volume online report, based on the 2009 count, Oracle Road between Ina and Orange Grove Roads has an average daily two-way traffic of 54,995 trips.
g. There are striped bike lanes but no pedestrian paths along the roadway.
h. The Pima County 5 Year Transportation Improvement Plan (TIP) calls for improvements to Ina Road at the Oracle Road intersection, however those improvements are now completed.

2. Exhibit I-F.2 shows the location of nearby streets. The nearest street to the south on 1st Ave, on the same side and about 75 feet away, is a short cul-de-sac, also by the name 1st Ave. There are no driveways or streets on the west side of 1st Ave in this area. On the south side of Ina Road, about 515 feet to the east, is Camino de las Candelas. With Ina Road being a divided roadway, with a raised median, the location of driveways and streets is not as important as it would be if the roadway were undivided. However, about 620 feet east of Christie Drive is Mountain Shadows Drive, which runs north from Ina Road. At the Mountain Shadows Drive there is a median opening in Ina Road.
3. There are no existing Sun Tran bus routes within ½ mile, nor are any planned.

## I-G. SEWERS

1. Exhibit I-G shows an existing 8" public sewer line (i.e. C-088 & G-82-014) running adjacent to the southeast boundary of the property, within an easement, within the adjoining Vistas de Las Candelas Lots 1, 6, 7, 12, 13 & 26, all owned by the same party that owns the subject property.
2. There are no conditions that would prevent designing and using a gravity sewer system.

## I-H. RECREATION AND TRAILS

1. There are no existing public parks within one mile of the property. There are three designated trails, within that distance, though.
2. Exhibit I-H shows three public planned trails, as identified on the Eastern Pima Regional Trail System Master Plan within a one mile radius. Those are the Pima Wash Trail (#43), the Geronimo Wash Trail (#42) and the Casas Adobes Wash Trail (#185).

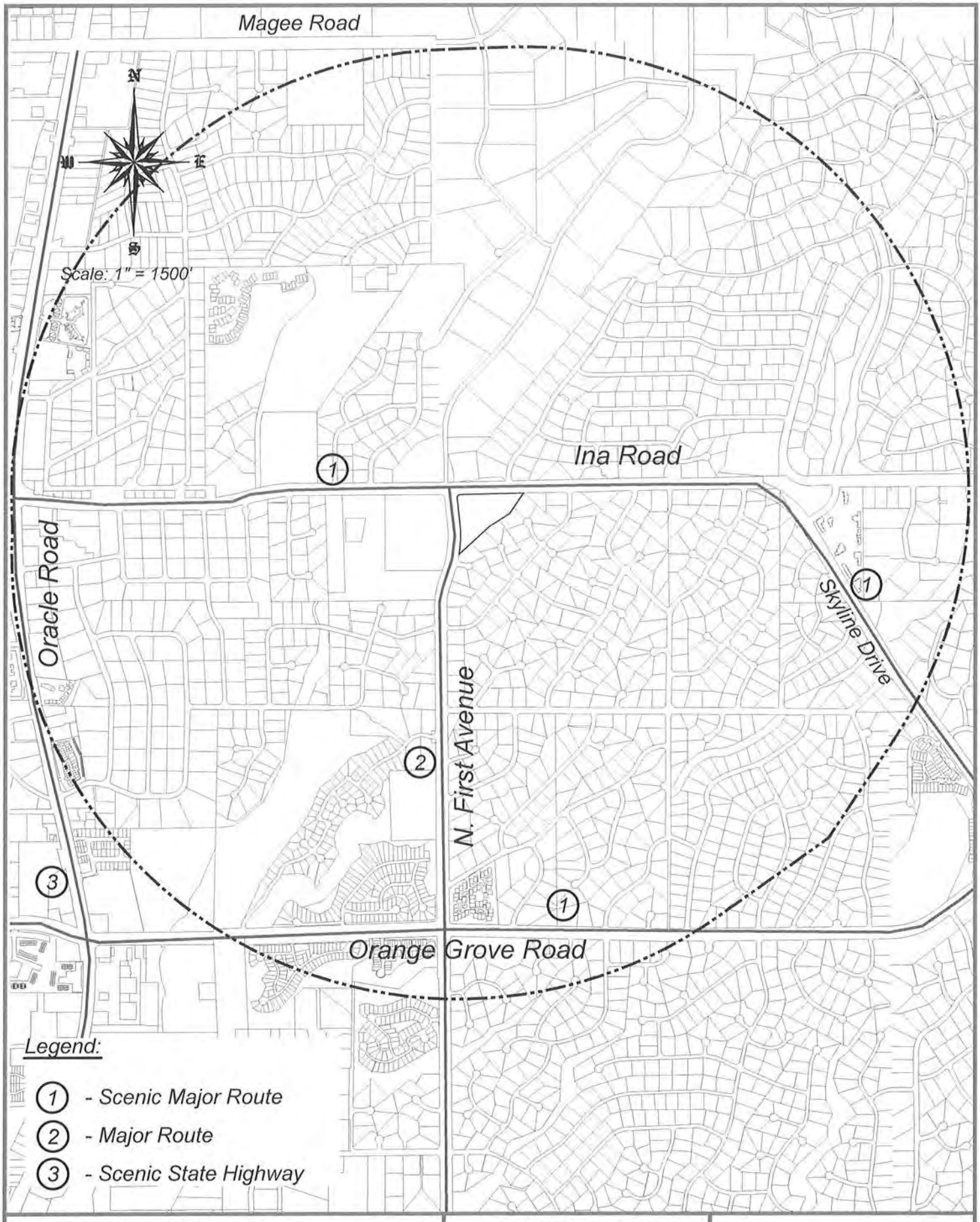


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Exhibit I-F.1
Major Routes Map

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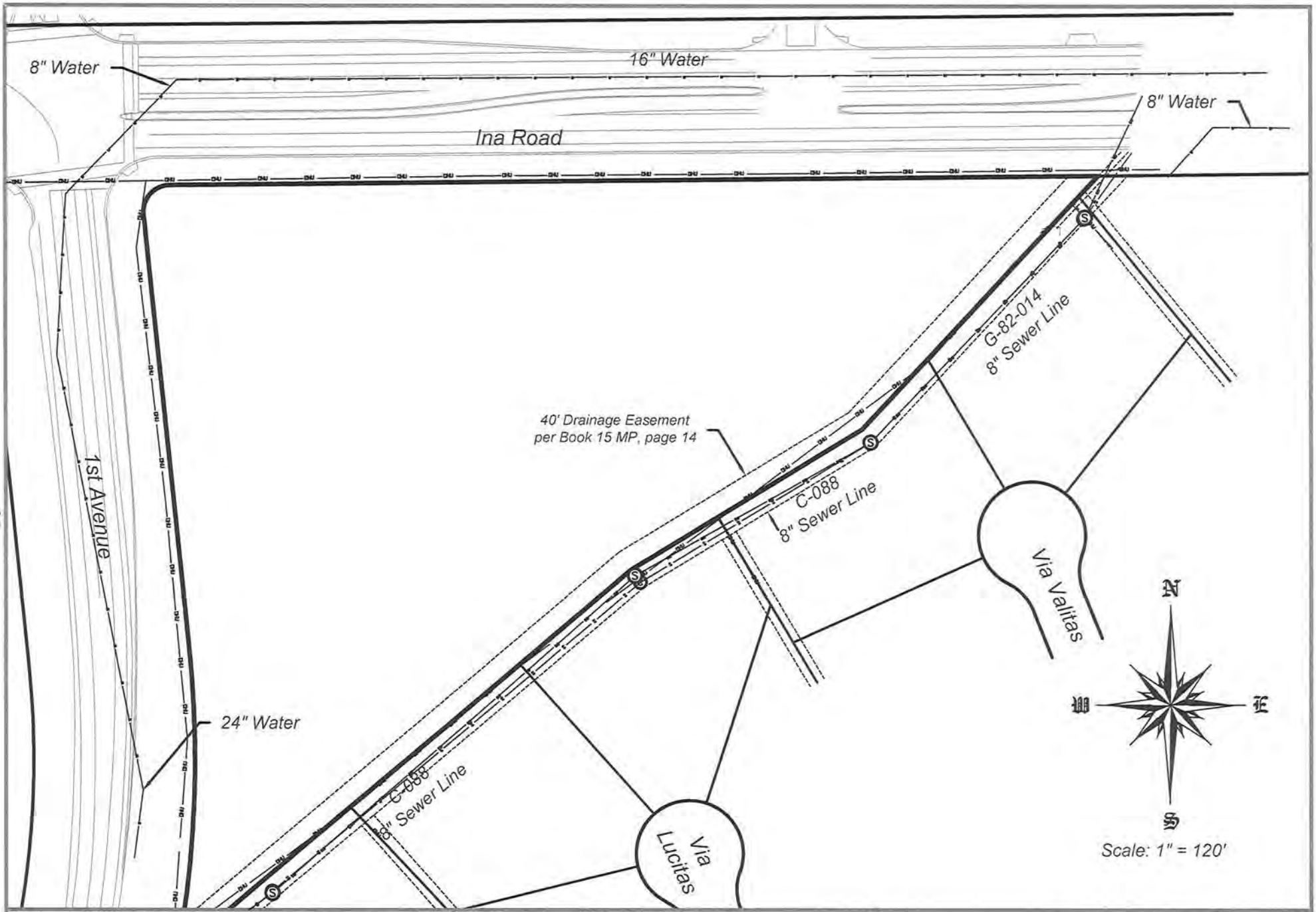
Exhibit I-F.2
Adjacent Streets Map

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*Pima County, Arizona*

*Exhibit I-G*
*Utility Map*

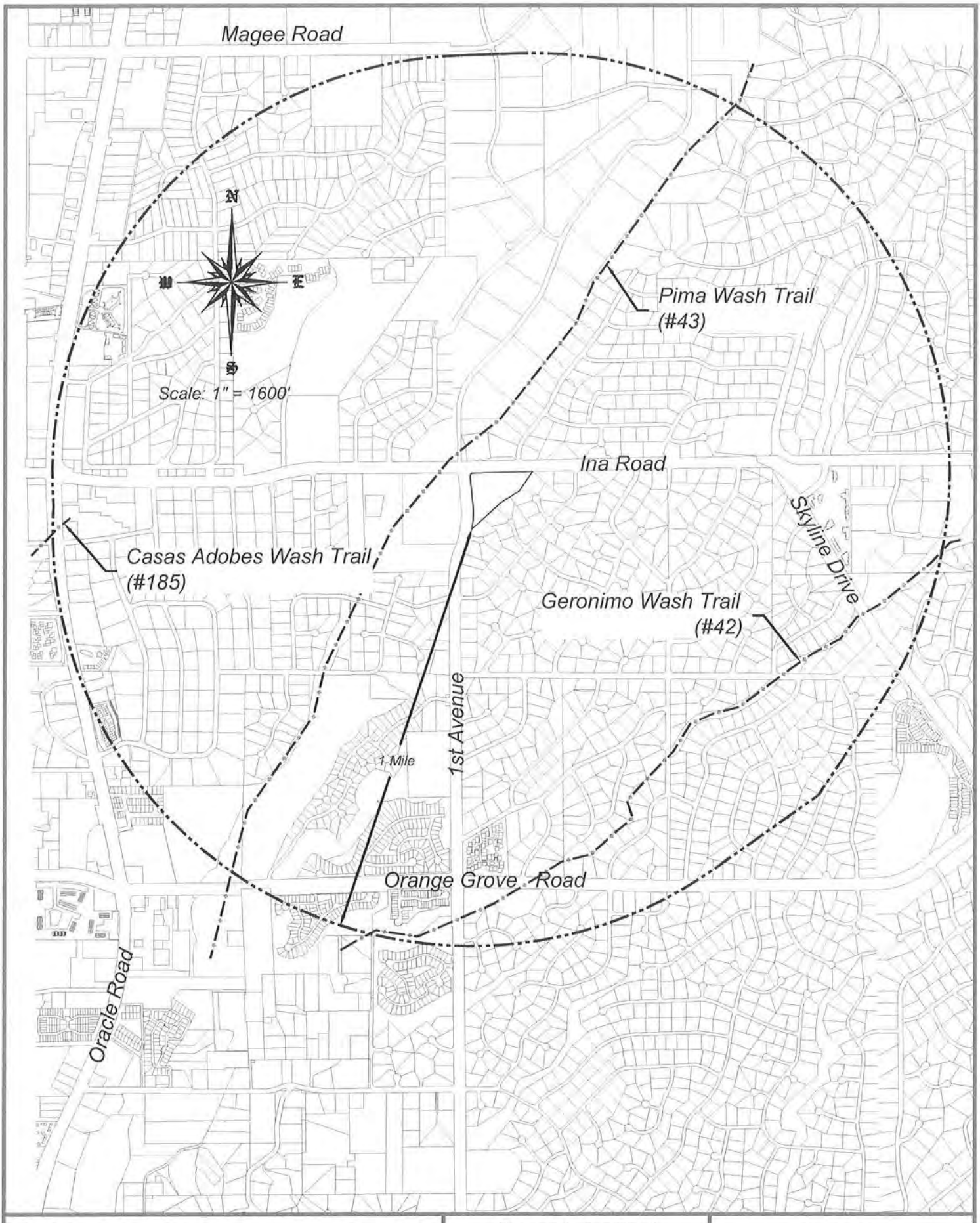


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Exhibit I-H
Parks and Trail Map

## I-I. CULTURAL RESOURCES: ARCHAEOLOGICAL AND HISTORIC SITES

1. An Archaeological Survey of the property was prepared by P.A.S.T on April 27, 2015. A copy will be supplied to the Pima County Cultural Resources Office concurrently with the review of this Site Analysis Report. It indicates that there is no record of any prior found resources. The Report says in part, on Page 8, "There were no surface indications of archaeological resources within the study area which meet the Arizona State Museum minimum standard for recording as an archaeological site or that would be eligible for inclusion in the National Register of Historic Places." It goes on to say, on Page 9, "development of the inspected parcel will not have a negative impact on important cultural resources within or in close proximity to the study area."
2. Based on the results of the archaeological study there is nothing to describe or map.
3. This is moot given the fact that an archaeological report has been prepared and the results were negative.

## I-J. AIR QUALITY

1. As this project is an office complex this section does not apply.

## I-K. COMPOSITE MAP

Exhibit I-K.1 graphically integrates the significant site features identified in the Report. It shows the slopes of 15 to 25% and those greater than 25%. It shows the local 100-year floodplain and the erosion hazard setback. It also shows the location of the saguaros. There are no other features listed in the checklist that apply. In addition to the paper copy of the Composite map there is an acetate overlay of the same (i.e. Exhibit I-K.2) which can be used over the Preliminary Development Plan. This overlay does not have topography since there are no significant topographic features.

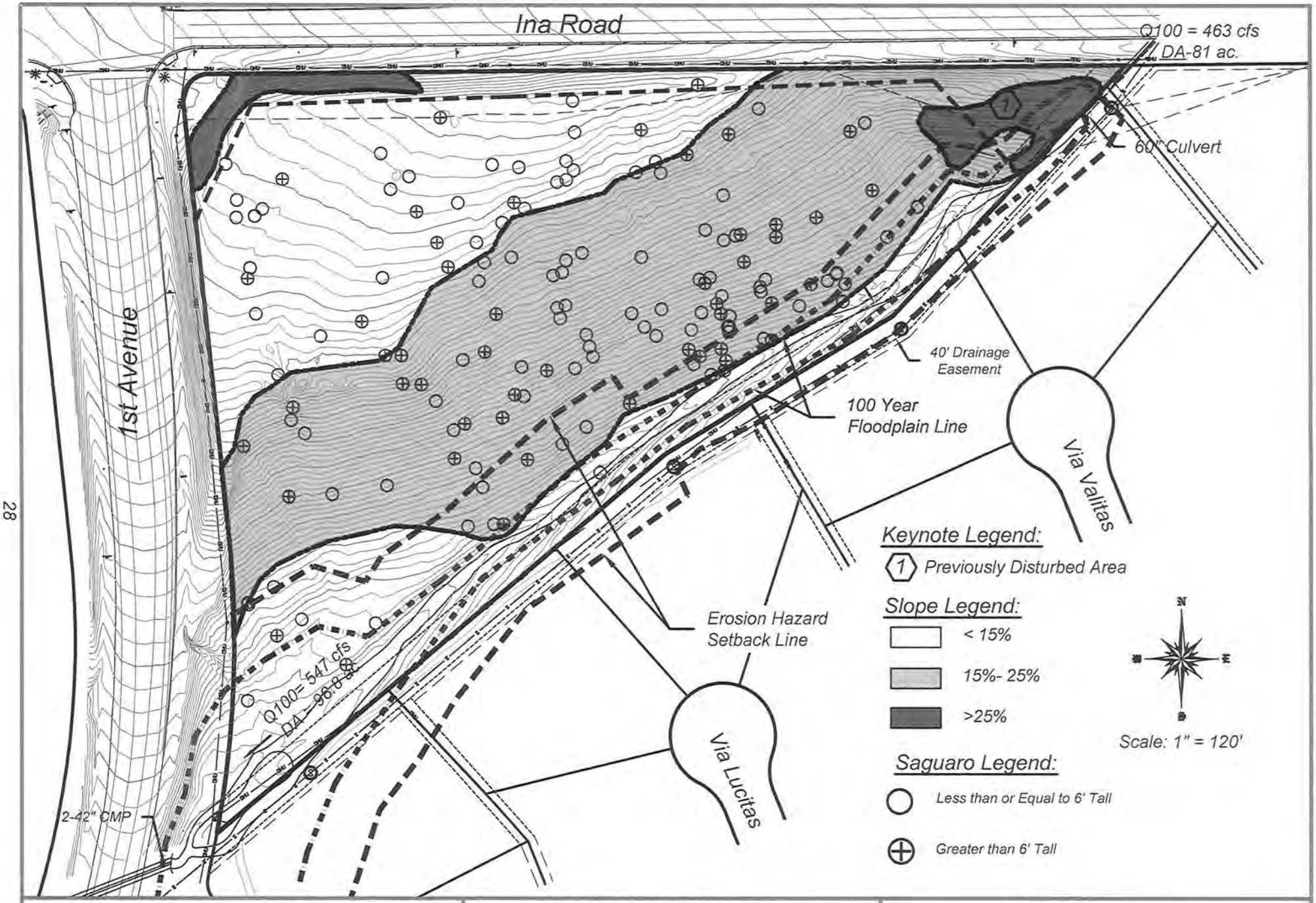


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Exhibit I-K.1
Composite Map

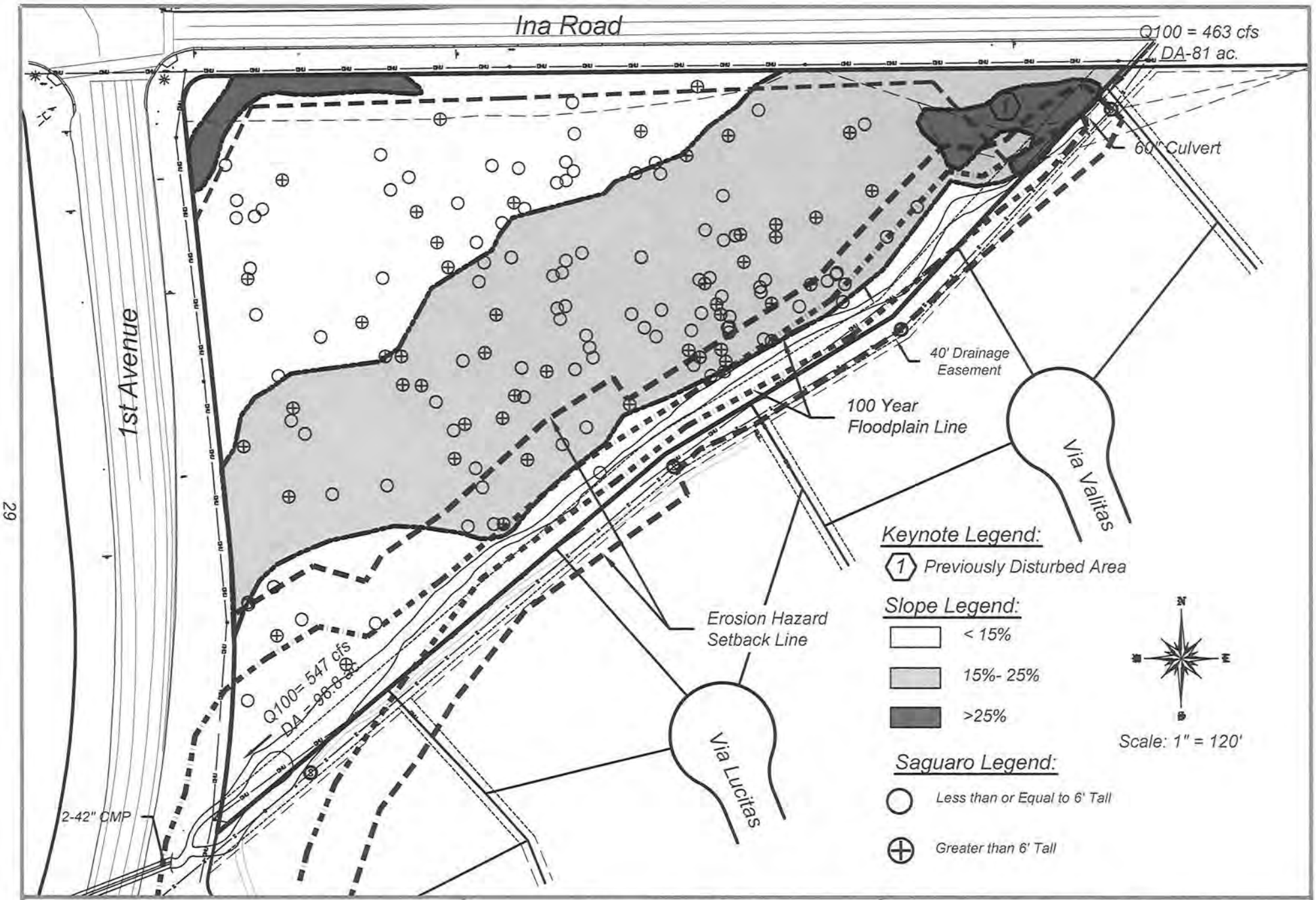


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Exhibit I-K.2
Composite Map Overlay

# PART II LAND USE PROPOSAL

## II-A. PROJECT OVERVIEW

1. The entire property in question is to be rezoned from SR to TR. There is no need to create a map for this item.
2. The property is to be developed into an office complex. The Preliminary Development Plan shows three office buildings with a total space of 33,000 square feet. No more than 50% of that space will be leased to 'medical' tenants with the remaining space leased to general office users.
    a. The proposed buildings and driveways and parking are located close to Ina Road and 1st Ave, away from the steepest slopes near the southeast boundary. The slope is the most sensitive characteristic of the property. In order to make the property developable a flat area needs to be created near the two perimeter streets, where grading has previously taken place as a result of roadway construction. The slope easement along Ina Road should no longer be necessary once the grading needed for this project takes place, and therefore is assumed to be unnecessary. There are full access driveways proposed for 1st Ave and the easterly driveway on Ina Road, located at a median opening. The westerly Ina Road driveway would be right-in/right-out only.
    b. The Comprehensive Plan calls for MIU which allows TR zoning. The office proposal is permitted in the TR zone and therefore would be in compliance with the Plan. Rezoning Policy RP-12 is satisfied as follows:
        A. There will be a natural bufferyard along the southeast border where the project is close adjacent to CR-1 residential development. There will also be landscaped bufferyards along Ina Road and 1st Ave to buffer the project from the residential on the other side of those streets.
        B. The Building height will be limited to one story and will not to exceed 24 feet.
        C. The proposed development will be limited to office uses, and,
        D. This subject is addressed separately in Appendix No. 3.

        Special Area Policy S-2 will be complied with by the developer commitment that the office buildings will not be any greater than 24 feet in height.
    c. There has not been a neighborhood meeting yet, but one will be held prior to the Planning & Zoning Commission public hearing.
    d. The Preliminary Development Plan represents a conversion of the property from vacant to 'developed' status for the majority of the property. A portion of the property will be left as 'natural', which is situated to provide a natural buffer to those to the east, southeast & south. This change in land use will impact the immediate neighbors as typically is perceived or occurs but also it will provide the benefits to these neighbors by the provision of medical and general office uses that they could use themselves. Due to the relatively modest project size there are no impacts expected to be felt by others within a quarter mile outside of the immediate area.
    e. The development of the property as planned is consistent with Growing Smarter principles in a number of ways. The development of the subject property, surrounded by development, makes the proposed project 'infill'. The development constitutes 'compact development' as defined by the Smart Growth Network. This classification is possible

because of the preservation of the natural open space along the southeast boundary, another smart growth principle. The proposed project conforms to another principle which calls for 'fair and cost effective' development, made possible by the proximity to existing utilities and other infrastructure. It should also satisfy Growing Smarter principles by shortening the drive that some in the nearby area currently take to obtain the services that they now will have the opportunity to have at the subject property.

f. There are no plans as of yet to utilize solar energy systems. The builder, however, will comply with the County's Green Building Program.

3. The property is not subject to a) Buffer Overlay Zone, b) the Gateway Overlay Zone, d) the Cluster Development Option, f) the Historic Zone, or g) the Airport Environs and Facilities Zone. It is subject to c) the Hillside Development Zone (HDZ), and e) the Native Plant Preservation Ordinance (NPPO). Regarding the HDZ, the average cross slope applicable to the site should be that contained within the Agreement between Pima County and the Owner, which is enclosed as Appendix 1. The property will comply with all HDZ standards.. Regarding the NPPO compliance will be demonstrated during the Development Plan stage. At that point the decision to comply using the Set-aside Method or the Selective Plant Preservation Method will be made. In any event the number of saguaros left in place or transplanted onsite will achieve the 80% rule stipulated in the Code.

## II-B. PRELIMINARY DEVELOPMENT PLAN

1. Exhibit II-B.1a depicts the Preliminary Development Plan with topography. Exhibit II-B.1b is the same but without the topography, and in the form of a removable transparency overlay. These exhibits address all of the elements identified in Section II-B.1 of the Checklist, covering the same elements as identified in Zoning Code Section 18.91.030E, to the extent that they apply. The following is provided for clarification:
    a. The site boundaries are shown.
    b. The Plan shows the location and size of all proposed office buildings.
    c. The Plan shows the Ina Road and 1st Ave right-of-ways.
    d. The Plan shows the three points of access, plus the Ina Road median opening, and the internal driveways. The internal sidewalks are shown on Exhibit II-H.1.
    e. The Plan shows the proposed parking.
    f. The Plan shows a 20 foot bufferyard along both Ina road and 1st Ave adjacent to the built project. These bufferyards will contain introduced landscaping and a screening structure. South of the built project on 1st Ave and east of it along Ina Road there will be a natural 40 foot bufferyard, and there will be along the southeast boundary,
    g. The areas around the buildings, which appear 'white' on the drawing, will be landscaped. That is shown on Exhibit II-F Landscape and Buffer Plan.
    h. There is no need to provide any recreation or common areas as that would be appropriate for residential development. There will be natural open space and that area is shown on Exhibit II-C.3 Preliminary Grading Map.
    i. The one onsite wash, along the southeast border, is to be left natural. The associated 100 year floodplain lines and the erosion hazard setback lines are shown. Also shown is the detention basin.

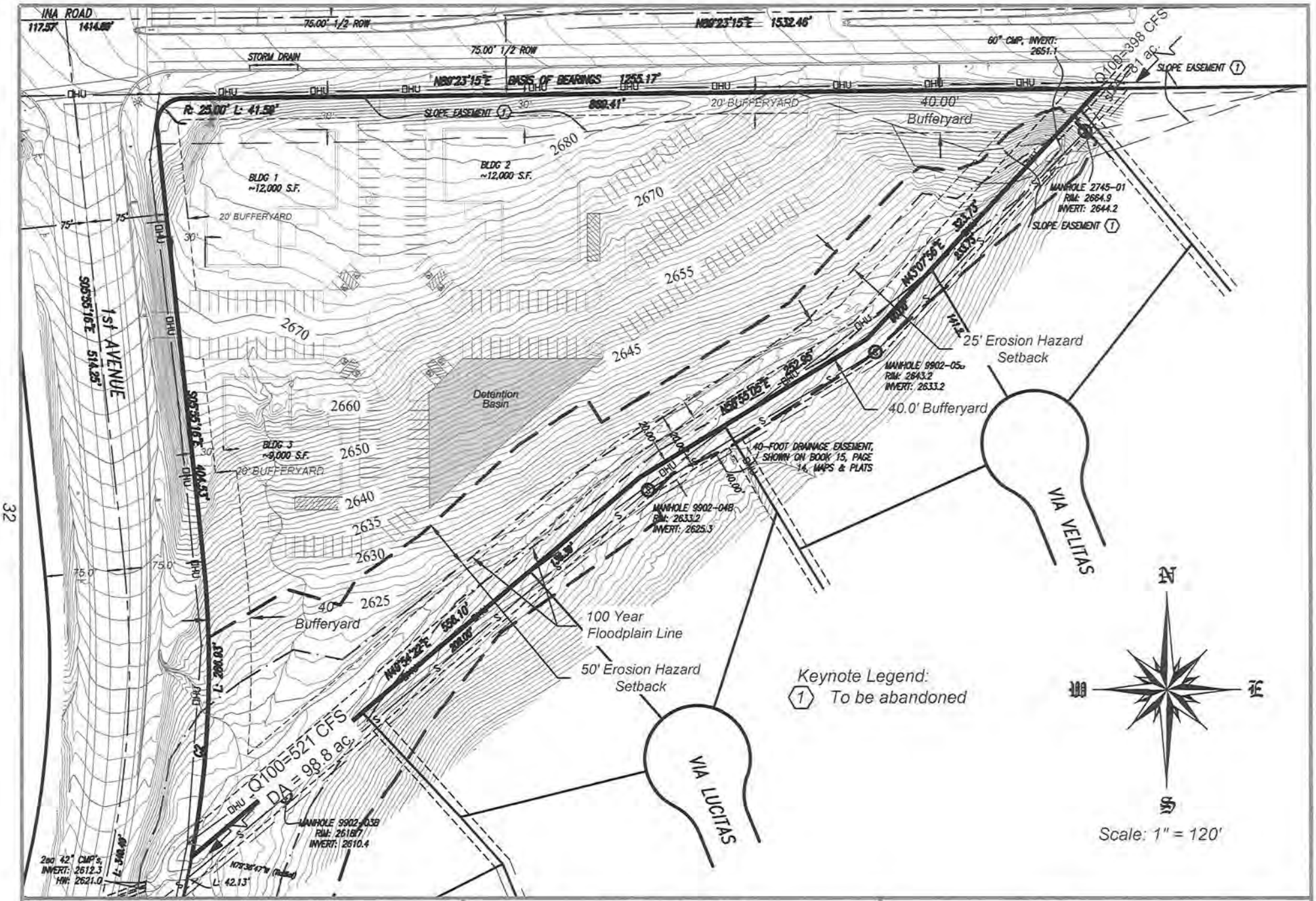




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Exhibit II-B.1a
Preliminary Development Plan

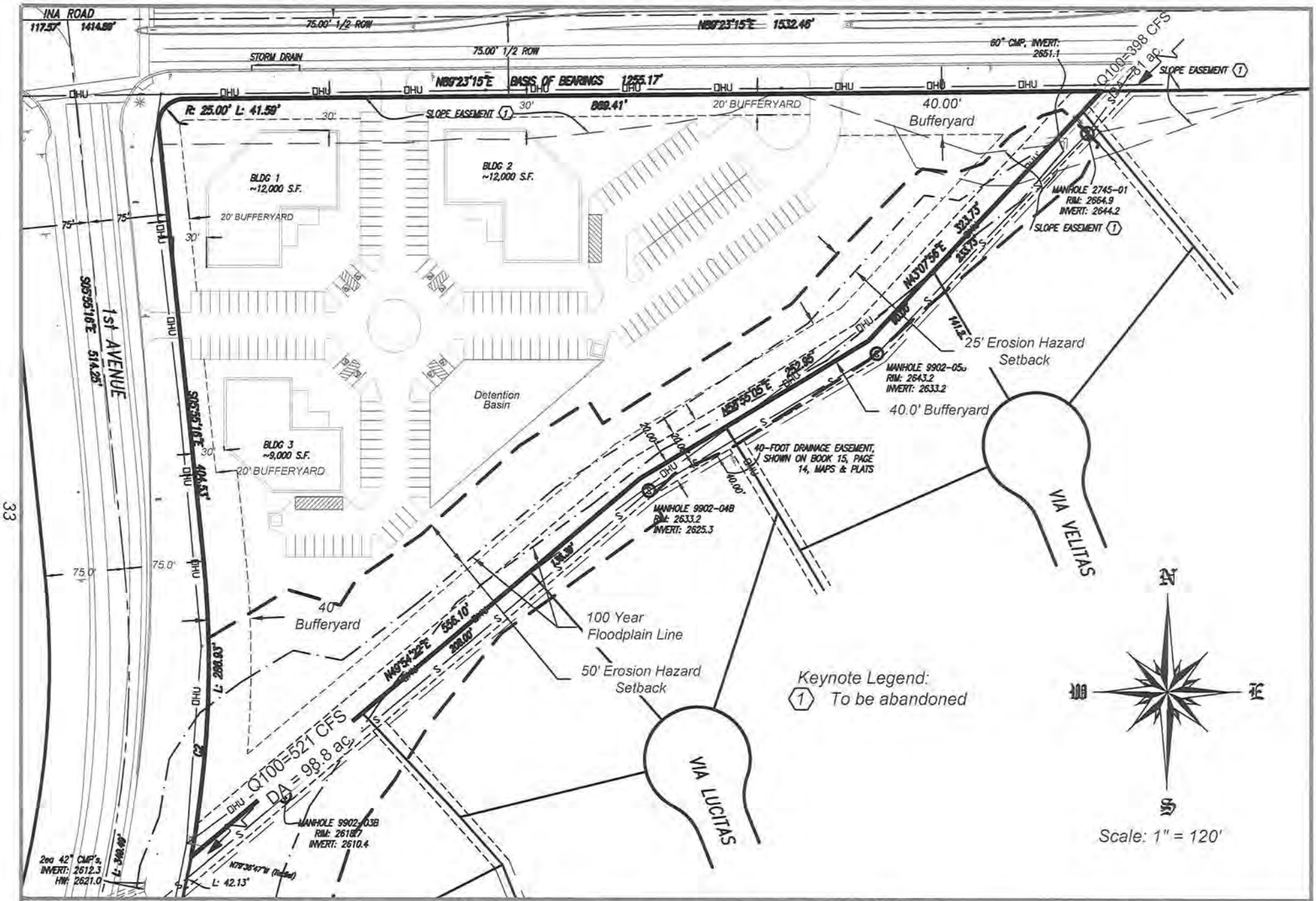


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Exhibit II-B.1b
PDP Overlay

j. There are no restricted peaks or ridges or any other significant physical features. The steepest slopes along the southeast border are preserved as natural.
k. All of the development within 300 feet is residential is zoned CR-1. Exhibit II-B.1.k shows the PDP with all properties within 300 feet. There are no 2-story homes within this area. There are several lots nearby shown to be vacant. In fact all of the lots along the southeast border are vacant, and this should lessen any impact on properties in that direction.
l. This point is moot as there are no such trails.
m. The Slope Easements along Ina Road are shown. The Owner will request that these easements, which are in favor of Pima County, be abandoned since there are no slopes that the County will need to maintain after the project is built. The PDP also shows the existing Drainage Easement along the southeast border, which will remain in place.
n. This point is moot. Sewers will be utilized.
o. This point is moot. There are no overlay zones.
p. This point is moot. There are no transit stops.

2. The following support data is provided:
   a. The total gross floor area is 33,000 square feet.
   b. The maximum building height will be 24 feet and one story.
   c. This does not apply.
   d. This does not apply.
   e. The Plan shows 198 parking spaces. This is based on one half of the space being medical office and the other half being general office. The medical office has 83 spaces based on 1 per 200 square feet of space and 40 for employees (at 1 space per employee). The general office has 55 spaces based on 1 per 300 square feet of space and 20 for employees (at 1 for every 2 employees).
   f. The landscape will be primarily characterized as 'desert', in compliance with the County's approved plant list.
   g. The project preserves a substantial portion of the site as natural open space. This area is identified on the Preliminary Development Plan and described in Section II-C.3. There is no recreation area as none is warranted for an office project.
   h. Appendix No. 3 shows a conceptual Building Elevation that would be typical for the three proposed office buildings.

## II-C. TOPOGRAPHY AND GRADING

1. The proposed development does encroach onto slopes of 15 percent or greater. A part of those 15% or greater slopes were man-made, those being along the north boundary. Along this same border and along the west side the elevation will be lowered with the exposed cut slope being relatively minor and with revegetation to reduce the visual impact. The fill slope on the southeast side, will be concealed by a retaining wall for a portion of this side and then for the remainder, near the west side, will contain a vertical wall with a bench for landscaping to obscure the wall. Between the retaining wall and vertical wall along the southeast side there will be a substantial amount of open space which will mitigate the visual impact of the grading.
2. There is no need to leave any land as natural due to the average cross slope. However, HDZ Table 18.61.054-1 does limit the grading for office development to 80% of the site, leaving a minimal of 20% as natural. That number will be exceeded.

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Exhibit II-B.1k
PDP with 300' Coverage