



**Coalition for  
Sonoran Desert Protection**

300 E. University Blvd., Suite 120  
Tucson, Arizona 85705  
p (520) 388-9925 • f (520) 791-7709  
www.sonorandesert.org

January 15, 2016

Arizona Center for Law  
in the Public Interest  
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  
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  
Genius Loci Foundation  
Native Seeds / SEARCH  
Northwest Neighborhood  
Alliance  
Protect Land and  
Neighborhoods  
Safford Peak Watershed  
Education Team  
Save the Scenic Santa Ritas  
Sierra Club – Grand Canyon  
Chapter  
Sierra Club – Rincon Group  
Sky Island Alliance  
Sky Island Watch  
Society for Ecological  
Restoration  
Sonoran Permaculture  
Guild  
Southwestern Biological  
Institute  
Tortolita Homeowners  
Association  
Tucson Audubon Society  
Tucson Herpetological  
Society  
Tucson Mountains  
Association  
Wildlands Network  
Women for Sustainable  
Technology

Chair and Members  
Pima County Board of Supervisors  
130 W. Congress St. 11<sup>th</sup> Floor  
Tucson, AZ 85701

**RE: Rezoning P15RZ00001, P15RZ00003, and P15RZ00004**

Dear Chair Bronson and Supervisors,

Thank you for the opportunity to provide comments on Rezoning P15RZ00001, P15RZ00003, and P15RZ00004 on the agenda for your January 19, 2016 meeting. During the Comprehensive Plan Amendment process for these three properties, the Coalition worked closely with the property owners to develop mitigation plans for these properties that allow the property owners flexibility and also fully comply with Conservation Lands System policies.

We remain in support of the rezoning policies adopted during the Comprehensive Plan Amendment process, especially those identified as “Environmental Planning conditions,” and further outlined in the attached February 13, 2014 memo from Planning Director Arlan Colton to the Board of Supervisors (attached). These policies resulted in Rezoning Standard and Conditions, recommended to the Board by both staff and the Planning and Zoning Commission.

**The Coalition supports Rezoning P15RZ00001, P15RZ00003, and P15RZ00004, as recommended by staff and voted to recommend by the Commission.**

Thank you for including us in these discussions. As you know, we strongly believe the Maeveen Marie Behan Conservation Lands System (CLS) is an important foundation of the Sonoran Desert Conservation Plan and we are encouraged that creative solutions can be reached that adhere to CLS policies, especially in the biologically-rich area of the Tortolita Fan.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Carolyn Campbell  
Executive Director



DATE: February 13, 2014

TO: Honorable Chairman and Members of the Board of Supervisors

FROM: Arlan Colton, Planning Director

SUBJECT: Comprehensive Plan Amendments Continued to February 18, 2014:  
Co7-13-03 Lawrence C. Leung, Inc. – N. Thornydale Road Plan Amendment;  
Co7-13-04 Pacific International Properties, LLP – N. Thornydale Road Plan  
Amendment;  
Co7-13-05 Mandarin Associates – N. Thornydale Road Plan Amendment;  
Co7-13-06 Hardy-Thornydale I Associates, et al. – W. Hardy Road Plan  
Amendment

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On November 19, 2013, the Board continued the above-referenced comprehensive plan amendment requests to January 21, 2014 and again to February 18, 2014, in part to allow discussions between the Coalition for Sonoran Desert Protection and the property owners (applicant). *The applicant and the Coalition are in agreement that full compliance with Special Species Management Areas conservation objectives as established by the Conservation Lands System – Regional Environmental Element will be met either entirely within a given amendment area or as a combination of on-site and off-site areas. This memo contains staff's recommended additional Rezoning Policy for each case pertaining to this matter.*

The applicant has provided a framework plan for each plan amendment site that conceptualizes natural open space set-aside in addition to showing riparian areas to be conserved. The additional set-asides are conceptually shown mostly in the form of buffers to neighboring residential properties varying from 50 to 150 feet in width for cases Co7-13-03, 05, and 06. The set-aside concept for Co7-13-04 (the site south of the Audubon Society property) preserves all but eight acres of the 54.95-acre site which exceeds the set-aside area originally envisioned in the memo from the County Administrator dated August 27, 2013. The concept for this case also exceeds the 4:1 (four acres conserved to one acre developed) conservation measure sought for Special Species Management Areas. (The applicant mailed invitations to property owners in the vicinity of each plan amendment site to discuss the amendment requests and to solicit input on set-aside buffers. See attached meeting sign-in sheets.)

Where the full conservation measure is not met on-site, the applicant will provide additional off-site conservation on a 4:1 basis consistent with the existing Comprehensive Plan Environmental Element Regional Plan policy. Based on this existing policy, staff recommends the following additional Rezoning Policy for each plan amendment site, which also provides the approximate minimum total natural open space set-aside required for each site, as well as the approximate minimum on and off-site set-aside required based on the framework plan concepts:

#### **Co9-13-03 (southeast corner of Thornydale Road and Linda Vista Boulevard)**

4. Future development shall be in full compliance with the Special Species Management Areas conservation objectives as established by the Conservation Lands System – Regional Environmental Element. Subsequent rezoning(s) will be considered in conformance with this policy when all of the following are met:
  - natural open space set-asides will either be provided entirely within the amendment area or as a combination of on-site and off-site areas;
  - the site areas of plan amendment cases Co7-13-04, 05, and 06 are not eligible to serve as off-site set-asides;
  - off-site set-aside areas are acceptable to Pima County;
  - off-site set-aside areas are permanently protected as natural open space by a separately recorded legal instrument acceptable to the Pima County Planning Official or designee; and
  - the approximate minimum total natural open space (NOS) set-aside is 33 acres, the approximate minimum on-site NOS set-aside is 9 acres, and the approximate minimum off-site NOS set-aside is 24 acres (acreage may be adjusted accordingly if more than minimum on-site set-aside acreage is provided).

#### **Co9-13-04 (northwest corner of Thornydale Road and Cortaro Farms Road)**

2. Future development shall be in full compliance with the Special Species Management Areas conservation objectives as established by the Conservation Lands System – Regional Environmental Element. Subsequent rezoning(s) will be considered in conformance with this policy when all of the following are met:
  - natural open space set-asides will either be provided entirely within the amendment area or as a combination of on-site and off-site areas;
  - the site areas of plan amendment cases Co7-13-03, 05, and 06 are not eligible to serve as off-site set-asides;
  - off-site set-aside areas are acceptable to Pima County;
  - off-site set-aside areas are permanently protected as natural open space by a separately recorded legal instrument acceptable to the Pima County Planning Official or designee; and

- the approximate minimum total natural open space (NOS) set-aside is 46 acres, the approximate minimum on-site NOS set-aside is 46 acres, and the approximate minimum off-site NOS set-aside is 0 acres.

**Co9-13-05 (northwest corner of Thornydale Road and Magee Road)**

3. Future development shall be in full compliance with the Special Species Management Areas conservation objectives as established by the Conservation Lands System – Regional Environmental Element. Subsequent rezoning(s) will be considered in conformance with this policy when all of the following are met:
  - natural open space set-asides will either be provided entirely within the amendment area or as a combination of on-site and off-site areas;
  - the site areas of plan amendment cases Co7-13-03, 04, and 06 are not eligible to serve as off-site set-asides;
  - off-site set-aside areas are acceptable to Pima County;
  - off-site set-aside areas are permanently protected as natural open space by a separately recorded legal instrument acceptable to the Pima County Planning Official or designee; and
  - the approximate minimum total natural open space (NOS) set-aside is 38 acres, the approximate minimum on-site NOS set-aside is 7 acres, and the approximate minimum off-site NOS set-aside is 31 acres (acreage may be adjusted accordingly if more than minimum on-site set-aside acreage is provided).

**Co9-13-06 (south side of Hardy Road, approx. 1,300 feet east of Thornydale Road)**

2. Future development shall be in full compliance with the Special Species Management Areas conservation objectives as established by the Conservation Lands System – Regional Environmental Element. Subsequent rezoning(s) will be considered in conformance with this policy when all of the following are met:
  - natural open space set-asides will either be provided entirely within the amendment area or as a combination of on-site and off-site areas;
  - the site areas of plan amendment cases Co7-13-03, 04, and 05 are not eligible to serve as off-site set-asides;
  - off-site set-aside areas are acceptable to Pima County;
  - off-site set-aside areas are permanently protected as natural open space by a separately recorded legal instrument acceptable to the Pima County Planning Official or designee; and
  - the approximate minimum total natural open space (NOS) set-aside is 75 acres, the approximate minimum on-site NOS set-aside is 10 acres, and the approximate minimum off-site NOS set-aside is 65 acres (acreage may be adjusted accordingly if more than minimum on-site set-aside acreage is provided).

<b>Amendment Site</b>	<b>Approx. Minimum Acres of Total Set-Aside</b>	<b>Approx. Minimum On-site set-aside acreage</b>	<b>Approx Minimum Off-site set-aside acreage (Acreage may be adjusted accordingly if more than Minimum On-site Set-Aside acreage is provided)</b>	<b>On-site/Off-site Set-aside Ratio</b>
SEC Linda Vista Blvd (Co07-13-03)	33	9	24	1:2.6
NWC Cortaro Farms Road (Co7-13-04)	46	46	0	100% on-site
Hardy Road (Co7-13-06)	75	10	65	1:6.5
NWC Magee Road (Co7-13-05)	38	7	31	1:4.4

(Acreages presented in this Table are approximations provided for preliminary planning purposes. They have been used to derive those On-site/Off-site Set-aside Ratios to be implemented through implementation of this Rezoning Policy.)

Cc: Jim Portner, Projects International, Inc.