



Coalition for Sonoran Desert Protection

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AGENDA MATERIAL
DATE 10/17/23 ITEM NO. RA 55

October 12, 2023

- Arizona Center for Law in the Public Interest
- Arizona Master Naturalist Association
- Arizona Native Plant Society
- Bat Conservation International
- Cascabel Conservation Association
- Center for Biological Diversity
- Center for Environmental Ethics
- Defenders of Wildlife
- Desert Watch
- 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
- Great Old Broads for Wilderness – Tucson
- Native Seeds / SEARCH
- 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
- Southwestern Biological Institute
- Tortolita Alliance
- Tortolita Homeowners Association
- Tucson Audubon Society
- Tucson Herpetological Society
- Tucson Mountains Association
- Wildlands Network

Chair Adelita Grijalva and Board Members
Pima County Board of Supervisors
33 N. Stone Ave, 11th Floor
Tucson, AZ 85701

RE: P22SP00002 Thornydale Sumter Specific Plan

Dear Chair Grijalva, Supervisor Scott, and Board Members:

Thank you for the opportunity to provide comments on the proposed Thornydale Sumter Specific Plan, a concurrent comprehensive plan amendment and rezoning. This issue was before the Commission on November 30, 2022, after which the applicant withdrew the request. On August 30, the Commission again considered a similar Specific Plan.

This 18+-acre property consists of two parcels at the northeast corner of Thornydale and Sumter. Importantly, the westernmost of the two parcels was identified as a *High Priority Private Habitat Protection* parcel, which means it is an important property to be protected in perpetuity.

The property owner has committed to full CLS compliance, which will consist of a combination of on-site conservation and off-site mitigation. The staff report states,

“The entire site is located within the Maeveen Marie Behan Conservation Lands System (CLS) designated as Special Species Management Area (SSMA) and there are approximately 16.55 acres within the Multiple Use Management Area (MUMA) and approximately 2.1 acres of Important Riparian Area (IRA). The IRA areas of the site are regulated by the Pima County Regional Flood Control District (RFCD) and CLS compliance will be met through a combination of natural open space set-aside and restoration of the denuded areas of the IRA. The CLS policies will be met through 6.5 acres of on-site natural open space preservation and 39.1 acres of off-site natural open space preservation.”

While the Coalition encourages and would prefer to have as many *High Priority Habitat Protection* parcels as possible be conserved in their entirety, we understand that this property is privately-owned and not for sale. Partial off-site mitigation complies with the Conservation Lands System and Pima Prospers mitigation policies.

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We have had multiple meetings with the property owner and their representatives, and appreciate their responsiveness to concerns and recommendations that we have provided on issues of sustainability, including but not limited to, the following Specific Plan commitments:

- Water conservation measures, including water harvesting techniques.
- Native plant preservation and/or salvage and replanting on site, including mammillaria, opuntia and hedgehog species, and particularly saguaros and ironwoods.
- Fence, wall, and channel design especially adjacent to riparian areas/wildlife corridors.
- A con-arch bridge spanning the westernmost riparian area/wildlife corridor.
- Motion activated lighting designed to minimize disturbances to human health, plants, and wildlife, with low color temperatures $\leq 2200\text{K}$ to minimize adverse impacts.
(<https://www.led-professional.com/resources-1/articles/hazard-or-hope-leds-and-wildlife>)
- Installation of EV charging stations.
- Covered parking areas built to harvest and direct rainwater and wired to accommodate solar panels.
- Solar energy to support the business and recreation facilities of the development.
- Revisions regarding Section II.C.4.d (Retention Basin) and Section II.C.6 (Environmentally Sensitive Design Guidelines)

The Coalition is supportive of the commitments contained in the Specific Plan as listed above; as well, we support staff's Standard and Special Conditions.

The Coalition strongly prefers mitigation to occur on-site as opposed to off-site when a parcel is designated a *Highest Priority Habitat Protection Parcel* and is previously undisturbed, as is the westernmost of the two parcels. However, the Conservation Lands System guidelines currently allow a combination of on- and off-site mitigation. Therefore, the Coalition is supportive of this Comprehensive Plan Amendment and Specific Plan rezoning.

Again, thank you for the opportunity to comment, and please let me know if you have any questions.

Sincerely,



Carolyn Campbell, Executive Director

Attachment: Lazarus and Silvyn letter of August 28, 2023

Cc: Terri Tillman, Principal Planner
Jenny Neeley, Program Manager, Office of Sustainability and Conservation
Chris Poirier, Planning Official