



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

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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

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

**RE: P15RZ00005, Pacific Properties International, LLP – N. Thornydale Road
Rezoning**

Dear Chair Bronson and Supervisors,

We are pleased to submit comments and recommendations regarding P15RZ00005, Pacific Properties International, LLP-N. Thornydale Road. This 55-acre parcel is located at the northwest corner of Cortaro and Thornydale Roads and lies directly south of the Audubon Mason Center for Ironwood Preservation and Education (AMC) preserve. AMC is due south of the portion of the County's Arthur Pack Park (APP) that is managed as an open space preserve. The rezoning of the Pacific Properties parcel as recommended by the Planning and Zoning Commission, County staff, and with Coalition recommendations, will preserve the majority of this parcel and create an important buffer to the "anchor preserves" of APP and AMC.

As the Pacific Properties parcel has moved through the entitlement process, we have worked with the property owners and their representative to not only comply with Conservation Lands System policies, but also develop on-site conditions on the developed portion that can best be compatible with the adjacent open space.

At the Planning Commission hearing there was one issue unresolved with the owner; that being buffering the open space portion from the developed portion. We have since met with the property owner to develop language for an additional Special Condition (7.C), and offer the following:

C. The property owner/developer shall provide safeguards for the natural open space parcel as follows:

- All lighting on the commercial site will be in conformance with the Outdoor Lighting Code. Light standards shall be located and fixtures shall be oriented so as to allow no light scatter onto the adjacent open space parcel.*
- Appropriate buffering shall be provided to discourage wildlife from entering the commercial property and to provide a measure of noise mitigation. No one particular material, technique, or design is stipulated by this condition for the buffering. Alternative materials and approaches are permitted, including structures, natural materials, wildlife-exclusionary fencing, and vegetative screening, subject to the method(s)*

chosen reasonably achieving the purposes specified above while also recognizing site needs and development conditions with respect to grading, drainage, and aesthetics.

With the addition of Condition 7C, the Coalition can support P15RZ00005, Pacific Properties International, LLP – N. Thornydale Road Rezoning, as presented by staff and recommended by the Planning and Zoning Commission.

Coalition representatives plan to continue working with the property owners, the eventual end users, and county staff, subsequent to rezoning should it be approved by the Board, on the following issues:

- Preserving vegetation on the edges of the developed portion of the parcel to the greatest extent feasible, including an iconic ironwood tree on the corner of Cortaro and Thornydale Roads.
- Implementing robust water harvesting projects on the developed portion of the site.
- Salvaging plants from the developed portion of the parcel and restoring areas of disturbance on the open space portion of the parcel.
- Developing an “Individualized Parking Plan” that would identify and implement less-impactful development, such as shared parking to diminish the amount of parking spaces and pavement area, and considering alternative surface(s) that would allow for water infiltration, among others.

Thank you for consideration of our comments. 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.

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

Sincerely,



Carolyn Campbell
Executive Director