



**Coalition for
Sonoran Desert Protection**

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September 11, 2015

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

Supervisor Ally Miller, District 1
Pima County Board of Supervisors
130 W. Congress St, 11th Floor
Tucson, AZ 85701

RE: Co9-15-02 PRF3, LLC – W. BRIAR ROSE LANE REZONING

Dear Supervisor Miller and Boardmembers,

Thank you for the opportunity to provide comments on the proposed W. Briar Rose Lane Rezoning, Co9-15-02. This 9.79-acre parcel is designated as *Highest Priority Private Habitat Protection Priority* in the Conservation Bond Program, which qualifies it for acquisition and is intended to “guide implementation of the county’s Multi-Species Habitat Conservation Plan.” The Bond Implementation Ordinance states,

The objective of developing the Habitat Protection Priorities was to apply a set of biologically based goals and criteria to the Conservation Lands System to: 1) identify the most important lands to protect first; 2) provide recommendations on the sequencing of land preservation efforts; and 3) design a project so that it can be easily incorporated into an adaptive management program to be implemented over the life of the Federal Section 10 Permit using the best scientific information available.

In other words, this is an important parcel and needs to either be protected on-site or the habitat lost needs to be suitably mitigated for by protecting other, biologically-important land.

This parcel contains multiple Conservation Lands System (CLS) categories under the Comprehensive Land Use Plan. CLS categories present on the property have associated open space guidelines: at least 95% open space in Important Riparian Area and 80% open space in Special Species Management Area. CLS guidelines call for on-site conservation and/or off-site mitigation if development commences.

The Comprehensive Plan Amendment for this property that was approved by the Board of Supervisors on October 21, 2014 included the following policies, with the understanding that they would be applied at the time of rezoning:

- 1) The location of off-site mitigation properties should be within the same general geographic region of the original project site.
- 2) Off-site mitigation property should provide the same or better resource values as the original project site including, but not limited to:
 - a. Conservation Lands System (CLS) designations inclusive of 2004 Conservation Bond Habitat Protection Priority designations;
 - b. Vegetation community type (s);
 - c. Habitat values for applicable CLS Special Species (e.g., breeding, dispersal);
 - d. Surface water or unique landforms such as rock outcrops; and
 - e. Contribution to landscape connectivity.

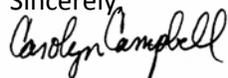
- 3) Demonstration that the resource and conservation values of the off-site mitigation property will be protected in perpetuity.

We have been working with the property owner to assess options for appropriate off-site mitigation, and we **support their proposal to mitigate their impacts to the CLS by purchasing a ~27-acre parcel in Cochie Canyon in the Tortolita Mountains and deeding this parcel to Pima County for long-term protection and management.**

In addition, since the acreage of this off-site mitigation parcel does not meet the amount of mitigation as defined by the Conservation Lands System Guidelines (SSMA off-site mitigation equals ~32 acres), **we request that Conditions 14-16, recommended by the Planning and Zoning Commission at their July 2015 meeting, be included as conditions:**

14. All saguaros 14 feet in height or less and all ironwood trees meeting the transplanting criteria of the Zoning Code Chapter 18.72 Native Plant Preservation Ordinance and the Native Plant Preservation Manual shall be preserved in place or salvaged and transplanted on-site where practicable. For saguaros and ironwood trees that cannot be transplanted on-site, at the time of grading the property owner/developer shall move and plant a maximum of 10 saguaros and move 10 ironwood trees to Arthur Pack Regional Park or some other location within close proximity (no greater than 1.5 miles) of the subject property as approved by Pima County. Pima County will consult with the property owner/developer and the Coalition for Sonoran Desert Protection on the determination of the location of the off-site movement of saguaros and ironwood trees. Off-site movements of saguaros and ironwood trees shall not occur prior to the approval of the Native Plant Preservation Plan.
15. The property owner/developer shall move a maximum of 10 palo verde trees at the time of grading to Arthur Pack Regional Park or some other location within close proximity (not greater than 1.5 miles) of the subject property as approved by Pima County. Pima County will consult with the property owner/developer and the Coalition for Sonoran Desert Protection on the determination of the location of the off-site palo verde tree movements. Off-site movements of palo verde trees shall not occur prior to approval of the Native Plant Preservation Plan.
16. Prior to grading of the site, the property owner/developer shall provide written notification to and sufficient time for Tucson Audubon Society and the Tucson Cactus and Succulent Society to salvage vegetation on-site that is not identified for preservation or transplanting on the Native Plant Preservation Plan. Pima County shall be copied on the written notification(s).

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

Sincerely,


Carolyn Campbell
Executive Director