



## Coalition for Sonoran Desert Protection

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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

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

### **RE:P16CA00001 Wong Family LP – N. Thornydale Rd. Plan Amendment**

Dear Chair Bronson and Supervisors,

Thank you for the opportunity to provide comments on the proposed N. Thornydale Rd. Comprehensive Plan Amendment (P16CA00001 Wong Family LP – N. Thornydale Rd. Plan Amendment).

This 18.3-acre parcel contains multiple Conservation Lands System (CLS) categories under the Comprehensive Land Use Plan. These include Important Riparian Area (IRA) and an underlying Multiple Use Management Area with a Special Species Management Area (SSMA) overlay.

The CLS categories present on the property have associated open space guidelines: at least 95% open space in IRA and 80% open space in SSMA. CLS guidelines call for on-site conservation and/or off-site mitigation if development commences. We expect that any future request for rezoning on this property will be obligated to demonstrate, in detail, full compliance with CLS guidelines.

The Coalition for Sonoran Desert Protection supports the applicant's proposal to comply with CLS guidelines by using on-site conservation and off-site mitigation. We can support the proposal *if* guidelines for off-site mitigation are conditions for approval and are included and agreed to by the applicant at the Comprehensive Plan Amendment stage, to be applied at the time of rezoning. These guidelines have been implemented by Pima County on other projects and are included in the new draft Environment Element in *Pima Prospers*. The guidelines provide direction on how to appropriately select off-site mitigation lands and state the following:

- 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.

**Finally, at the August 31, 2016 Pima County Planning and Zoning Commission meeting, the commission supported our recommendations above when they recommended to approve this Comprehensive Plan Amendment.** Thank you again for the opportunity to comment. If you have any questions, please do not hesitate to contact me.

Sincerely,



Carolyn Campbell  
Director