

COB - BOSAIR FORM

09/24/2025 3:11 PM (MST)

Submitted by Anita.McNamara@pima.gov



BOARD OF SUPERVISORS AGENDA ITEM REPORT (BOSAIR)

All fields are required. Enter N/A if not applicable. For number fields, enter 0 if not applicable.

Record Number:

Award Type: Agenda Item

Is a Board Meeting Date Requested? Yes

Requested Board Meeting Date: 10/14/2025

Agenda Item Report

Record Number:

Title: P25CA00003 STEWART TITLE AND TRUST TR 1580 - W. IRVINGTON ROAD PLAN AMENDMENT

Introduction / Background: Stewart and Title and Trust TR 1580, represented by Paradigm Land Design LLC, requests a comprehensive plan amendment on approximately 12 acres (parcel code 21250012M) from the Low Intensity Urban-0.3 (LIU-0.3) to the Medium Low Intensity Urban (MLIU) land use designation, located on the northwest corner of the intersection of S. Camino de Oeste and W. Irvington Road, in Section 36, Township 14S, Range 12E, in the Southwest Planning Area.

Discussion: The owner requests the comprehensive plan amendment to MLIU to increase the density to a maximum of five residences per acre as a first step to rezone the property to a compatible zoning district.

Conclusion: Approval of the plan amendment would allow the owner to request a rezoning to a compatible zoning district that will facilitate new housing development.

Recommendation: The Planning and Zoning Commission recommends APPROVAL of the plan amendment request to Medium Low Intensity Urban (MLIU). Staff recommends APPROVAL of the plan amendment to MLIU.

Fiscal Impact: 0

Support of Prosperity Initiative: 1. Increase Housing Mobility and Opportunity

Provide information that explains how this activity supports the selected Prosperity Initiative: Approval of this comprehensive plan amendment will provide additional housing to help address housing supply in the region.

Board of Supervisor District: • 3

Department: Development Services, Planning Division

Name: Anita McNamara

Telephone: 5207248800

Department Director Signature: _____

 For

Date: _____

9/25/25

Deputy County Administrator Signature: _____



Date: _____

9/25/2025

County Administrator Signature: _____



Date: _____

9-26-24



TO: Honorable Jennifer Allen, Supervisor, District 3

FROM: Tom Drzazgowski, Deputy Director
Public Works-Development Services Department Planning Division

DATE: September 23 , 2025

SUBJECT: P25CA00003 STEWART TITLE AND TRUST TR 1580 – W. IRVINGTON ROAD
PLAN AMENDMENT

The above referenced Comprehensive Plan amendment is within your district and is scheduled for the Board of Supervisors' **TUESDAY, October 14, 2025** hearing.

REQUEST: For a **Comprehensive Plan amendment** of approximately 12 acres (parcel code 212-50-012M) from the Low Intensity Urban-0.3 (LIU-0.3) to the Medium Low Intensity Urban (MLIU) land use designation, located on the northwest corner of the intersection of S. Camino de Oeste and W. Irvington Road, in Section 36, Township 14S, Range 12E, in the Southwest Planning Area.

OWNER Stewart Title and Trust TR 1580
Attn: Ted Elliott
2238 Melford Ct
Thousand Oaks CA 91361-5058

AGENT: Paradigm Land Design LLC Paul Oland
372 S Eagle Road, #284
Eagle, ID 83616

DISTRICT: 3

STAFF CONTACT: Anita McNamara, AICP, Planner II

PUBLIC COMMENT TO DATE: As of September 23, 2025, staff has received no public comment.

PLANNING & ZONING COMMISSION RECOMMENDATION: **APPROVAL 8-0** (Commissioners Becker and Truitt were absent)

STAFF RECOMMENDATION: **APPROVAL**

MAEVEEN MARIE BEHAN CONSERVATION LANDS SYSTEM DESIGNATIONS: The subject site is located outside the Maeveen Marie Behan Conservation Lands System.

TD/AM/ds
Attachments



BOARD OF SUPERVISORS MEMORANDUM

SUBJECT: P25CA00003

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FOR OCTOBER 14, 2025 MEETING OF THE BOARD OF SUPERVISORS

TO: HONORABLE BOARD OF SUPERVISORS

FROM: Tom Drzazgowski, Deputy Director
Public Works-Development Services Department-Planning Division

DATE: September 23, 2025

ADVERTISED ITEM FOR PUBLIC HEARING

COMPREHENSIVE PLAN AMENDMENT

P25CA00003 STEWART TITLE AND TRUST TR 1580 – W. IRVINGTON ROAD PLAN AMENDMENT

Stewart Title and Trust TR 1580, represented by Paradigm Land Design LLC, requests a comprehensive plan amendment on approximately 12 acres (parcel code 21250012M) from the Low Intensity Urban-0.3 (LIU-0.3) to the Medium Low Intensity Urban (MLIU) land use designation. The site is located on the northwest corner of the intersection of S. Camino de Oeste and W. Irvington Road, in Section 36, Township 14S, Range 12E, in the Southwest Planning Area. On motion, the Planning and Zoning Commission voted to recommend **APPROVAL. 8-0** (Commissioners Becker and Truitt were absent). Staff recommends **APPROVAL.** (District 3)

Planning and Zoning Commission Public Hearing Summary (July 30, 2025)

The public hearing was held in person and virtually. Some commissioners attended in person while others attended virtually and through the telephonic option. Staff and the applicant attended and presented in person.

Staff presented information on the plan amendment request and stated that the recommendation was approval of the plan amendment.

Using maps and graphics, the applicant's representative presented an overview of the application and provided a summary of the history of the site and the surrounding neighborhood for the comprehensive plan amendment and stated that the requested Medium Low Intensity Urban (MLIU) land use designation will allow an increase in density and provide ability to move forward with a rezoning to support the proposed housing.

A commissioner asked about the future rezoning application boundaries. The applicant responded by providing a map showing the site boundaries of the future rezoning application.

P25CA00003

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A commissioner asked about the total number of units for the comprehensive plan amendment area.

The applicant responded that there will be an estimated number of 50 to 60 units for the amendment site.

The hearing was opened to the public and there were no speakers. The public hearing was closed.

Commissioner Maese made a motion to recommend **APPROVAL**; Commissioner Gungl gave second.

Upon a roll call vote, the motion to recommend **APPROVAL** passed 8-0 (Commissioners Becker and Truitt were absent).

TD/AM/ds
Attachments

c: Paul Oland, Paradigm Land Design LLC

Preliminary Development Plan





2025 PLAN AMENDMENT PROGRAM

PLANNING AND ZONING COMMISSION STAFF REPORT



HEARING DATE	July 30, 2025
CASE	STEWART TITLE AND TRUST TR 1580 – W. IRVINGTON ROAD PLAN AMENDMENT
PLANNING AREA	Southwest
DISTRICT	3
LOCATION	Northwest corner of the intersection of S. Camino de Oeste and W. Irvington Road
REQUEST	Low Intensity Urban 0.3 (LIU-0.3) to Medium Low Intensity Urban (MLIU) for approximately 12 acres
OWNER	Stewart Title and Trust TR 1580
AGENT	Paradigm Land Design, LLC

APPLICANT STATED REASONS TO AMEND THE COMPREHENSIVE PLAN:

"A housing shortage exists in the Tucson region. This proposed neighborhood will provide more housing options for first-time and early move-up homebuyers who may find their housing affordability options limited in other parts of Town."

STAFF REPORT:

Staff recommends approval of the comprehensive plan amendment to the Medium Low Intensity Urban (MLIU) land use designation. The amendment prepares the site for a rezoning to build additional housing to help address the shortage of housing in Pima County/Tucson Metro Region. The 12-acre plan amendment is a portion of an overall approximately 34-acre residential development.

The site is located outside the Maeveen Marie Behan Conservation Lands System and is in an area with existing infrastructure. The requested plan amendment to Medium Low Intensity Urban (MLIU) is consistent with the existing land use designation on surrounding properties to the north, east and west.

Background

The applicant proposes this comprehensive plan amendment to increase the permitted residential density on the approximately 12-acre site. Under the existing GR-1 (Rural Residential) zoning, a gross total of about 14 dwellings could be built on the site; under the requested MLIU designation, 5 RAC maximum, up to a gross total of 60 dwellings would be permitted.

The amendment site currently has Low intensity Urban 0.3 (LIU-0.3) land use designation, to designate areas for low density residential (up to 3 RAC) and other compatible uses, and to provide incentives for conservation subdivisions and preserve natural open space. The amendment site is the eastern twelve acres of an approximately 17-acre parcel. There are no

previous comprehensive plan amendments on the site. In 1962, a rezoning from GR-1 to CB-2 was approved but was subsequently closed. The site is undeveloped.

The amendment site is located in an area primarily developed with residential uses. The subdivided areas zoned CR-3 immediately north and east of the amendment site were developed in the 1980s through the early 2000s. To the south is a CR-1 zoned subdivision platted in the 1990s, along with mix of unsubdivided low-density development. Immediately west is undeveloped property zoned CR-4. To the east, at the northeast corner of the intersection of W. Irvington Road and N. Camino de Oeste, is a recently constructed residential development and an existing elementary school. Farther west is a recently platted subdivision north of W. Irvington Road between S. Kinney Road and S. Sheridan Road. These areas are zoned CR-4. Farther to the north along Ajo Highway, new commercial projects are being constructed.

The proposed amendment will provide additional needed housing on an infill site and is supported by the following Pima County Comprehensive Plan goals and policies:

3.1 Land Use Element

Goal 1: Integrate land use strategies with physical infrastructure, human infrastructure, economic development, and resource conservation to ensure the long-range viability of the region

Policy 1:

d) Provide an appropriate mix of land uses that: promotes the integrated and efficient use of infrastructure and services

Policy 4: Support land use, densities, and intensities appropriate for the urban, suburban, and rural areas of the unincorporated County.

3.2 Focused Development Investment Areas Element

Goal 1: Balance growth management strategies, economic development, conservation, community integrity and efficient use of services and infrastructure

Policy 1: Promote efficient growth in urban, suburban and rural areas compatible with each area's specific scale, character and identity in areas where infrastructure is planned or in place.

3.5 Housing and Community Design Element

Goal 11: Maximize the efficient use of land outside the Maeveen Marie Behan Conservation Lands System

Plan Amendment Criteria

Staff has reviewed this plan amendment request to determine if one or more of the following criteria have been adequately met:

1a. Growing Smarter Acts

- Create a range of housing opportunities: the amendment would provide needed housing units in the region
- Provide a variety of transportation choices: the amendment site is located in an area already developed with some transportation infrastructure. W. Irvington Road, along the southern boundary of the amendment site, is designated as a Medium Volume Arterial on the Major Streets and Routes Plan. Sun Shuttle 430 runs along W. Irvington Road. S. Camino de Oeste and W. Irvington are bike routes with striped shoulders

- Direct development toward existing communities: the amendment site is infill development and has access to existing utilities and facilities

1b. Comprehensive Plan Policies, Special Area Policies, and Rezoning Policies

The amendment site is covered by special area policy S-29, Southwest Infrastructure Plan (SWIP), which guides provision of infrastructure and services related to transportation, flood control, wastewater and parks. The site is also within the Southwest Growth Area / Focused Development Investment Area (FDIA), designated under the 2015 comprehensive plan update Pima Prospers as a growth area identified for a variety of land uses, infrastructure expansion, and multi-modal transportation.

1c. Maeveen Marie Behan Conservation Lands System

The amendment site is located outside the CLS.

2. Oversight, Inconsistencies, or Land Use Related Inequities/Changes

n/a

DEPARTMENT/AGENCY COMMENTS:

Department of Transportation

The Department of Transportation (DOT) has no objection to this request and will review and provide comments and conditions at time of rezoning application.

Regional Flood Control District

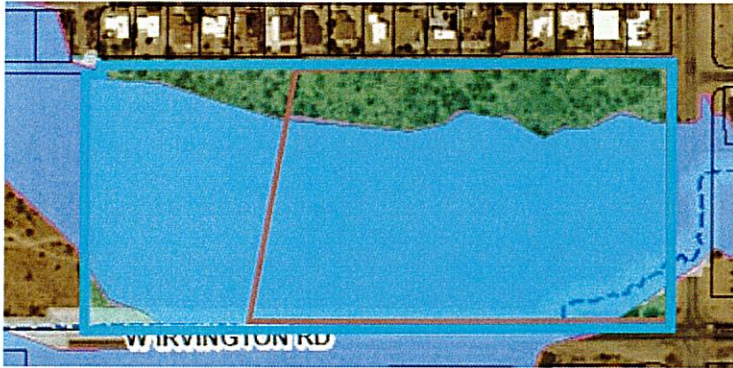
The District has reviewed the site conditions for a comprehensive plan amendment to revise the land intensity on approximately 12 acres from the Low Intensity Urban-0.3 (LIU-0.3) to the Medium Low Intensity Urban (MLIU) land use designation. This parcel is located on the northwest corner of the intersection of Camino de Oeste and Irvington Road. The tax code for this parcel is 21250012M.

The District offers the following informational comments:

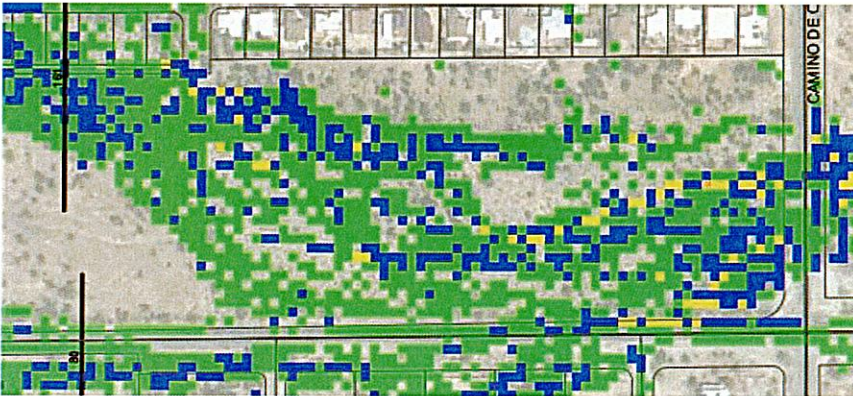
1. The subject property is located within Flood Control Resource Area (FCRA) due to the presence of the federally mapped and local floodplain from the Red Butte/Saginaw Hill Area Special Study effective July 8th, 2019. When the project goes through the anticipated rezoning the District has the expectation that the proposed design will be supportive of Pima Prospers Comprehensive Plan Policy 3.1.1.5, where development of land prioritizes setting aside floodplains as open space to maintain floodplain function, hydrologic integrity and to provide continuous open space corridors. The current subdivision layout is not supportive of this policy.

Additionally, upstream of the project the existing subdivision platted in 2019 has provided open space and preserved the floodplain to meet this policy. As such, the current design is not compatible with the upstream drainage conditions.

The project shall be designed to be compatible with upstream conditions, accept the offsite flows and preserve the floodplain flow pattern to minimize flood and erosion. The District recommends designing the subdivision to not block flow or encroach the floodplain and locate the lots to avoid the FCRA as much as practicable.



Flood Control Resource Area (Blue Polygon)



Red Butte/Saginaw Hill local floodplain depths

2. Design Standards for Stormwater Detention and Retention was adopted November 2015 where First Flush retention became a requirement and the use of Low Impact Development (LID) Practices was introduced. The project shall demonstrate that First Flush retention will incorporate this shift in stormwater management. At the time of rezoning the submittal shall demonstrate runoff will be directed to downstream locations through LID practices to meet the First Flush retention requirement.

3. A Will Serve Letter has not been provided at this time and the applicant has expressed the Will Serve Letter will be provided at the time of the applied rezone.

The District has no objection to this Comprehensive Plan Amendment, however, recommends designing the subdivision to avoid the Flood Control Resource Area to be supportive of Pima Prosper's Comprehensive Plan Policy 3.1.1.5. where development of land prioritizes setting aside floodplains as open space to maintain floodplain function, hydrologic integrity and to provide continuous open space corridors.

Regional Wastewater Reclamation Department

The subject property is within the PCRWRD service area. Sewer service is available through an 8" public sewer on Kinney Road.

PCRWRD has no objection to the proposed comprehensive plan amendment. A no objection shall not construe any action by Pima County as a commitment to provide sewer to any new development within the plan amendment area and does not ensure that there is adequate treatment and conveyance capacity to accommodate this plan amendment area in the downstream public sewerage system.

Environmental Planning Division

This project is outside the Maeveen Marie Behan Conservation Lands System (CLS).

Cultural Resources & Historic Preservation Division

If this plan amendment is approved, a condition shall be required at rezoning for a cultural resources survey prior to ground modifying activities; submittal of a cultural resources mitigation plan for any identified archaeological and historic sites with any tentative plan or development plan; and review of Type II grading permits for compliance with cultural resources requirements under Zoning Code Chapter 18.81.

Natural Resources, Parks and Recreation

The department has no comments.

TRICO

The utility has no objections.

Tucson Water

The utility has no comments.

Drexel Heights Fire District

The district has no comments.

PUBLIC COMMENTS:

As of July 15, 2025, staff has received no public comments regarding this amendment request.

Published and mailed notice of the proposal along with the website posting of this staff report will occur a minimum of fifteen (15) days prior to public hearing. The website will be updated to include public comment throughout the process to the Planning and Zoning Commission and the Board of Supervisors.

Respectfully submitted,

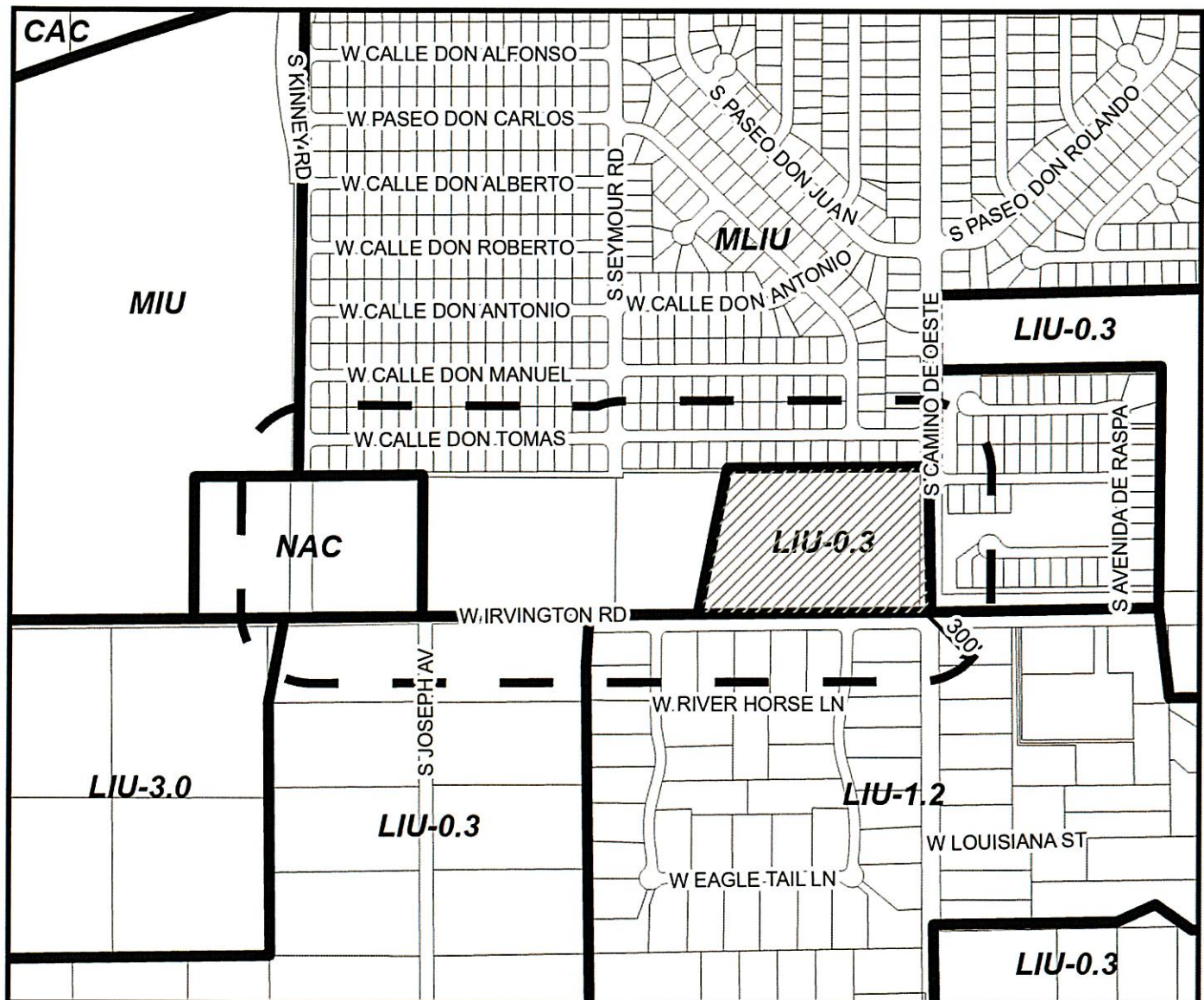


Anita McNamara, AICP
Planner II

cc: Paul Oland, Paradigm Land Design

COMPREHENSIVE PLAN AMENDMENT

Planned Land Use




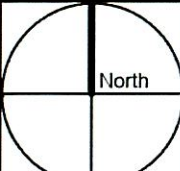
0 285 570 1,140 Feet



Subject Area



300' Notification Area

<p>Taxcode:</p> <p>Portion of 212-50-012M</p>	<p>P25CA00003 STEWART TITLE AND TRUST TR 1580 - W. IRVINGTON ROAD PLAN AMENDMENT</p> <p>Request: Low Intensity Urban-0.3 (LIU-0.3) to Medium Low Intensity Urban (MLIU) 12.0 Acres +/-</p>	<p>Districts 3</p> <p>Location: Northwest corner of the intersection of S. Camino de Oeste and W. Irvington Road</p>
	<p>Southwest Planning Area under Pima Prospers Sections 36, Township 14 South, Range 12 East</p> <p>Planning and Zoning Commission Hearing: July 30, 2025</p> <p>Board of Supervisors Hearing: TBD</p>	

Map Scale: 1:8,000

Map Date: June 25, 2025 / dms



Land Use Legend and Map

P25CA00003 STEWART TITLE AND TRUST TR 1580 – W. IRVINGTON ROAD PLAN AMENDMENT

Current: **Low Intensity Urban 0.3 (LIU-0.3)**

Low Intensity Urban (LIU)

Low Intensity Urban includes four land use categories designations ranging from a maximum of 3 RAC stepped down to 0.3 RAC. The Low Intensity Urban categories are LIU3.0, LIU1.2, LIU0.5, and LIU-0.3.

To designate areas for low density residential and other compatible uses and to provide incentives for residential conservation subdivisions to provide more natural open space. Density bonuses are offered in exchange for the provision of natural and/or functional open space. Natural open space must be set aside, where applicable, to preserve land with the highest resource value and be contiguous with other dedicated natural open space and public preserves.

Low Intensity Urban 0.3 (LIU-0.3)

- Residential Gross Density: Minimum- none; Maximum- 0.3 RAC; 0.7 RAC with 50 percent open space; or 1.2 RAC with 65 percent open space
- Residential Gross Densities for TDR Receiving Areas: Minimum- none; Maximum- 0.3 RAC; 0.7 RAC with 60 percent open space

***Requested:* Medium Low Intensity Urban (MLIU)**

To designate areas for a mix of medium density single-family and lower density attached dwelling units; to provide opportunities for a mix of housing types throughout the region.

- Residential Gross Density: Minimum- 2.5 RAC; Maximum- 5 RAC
- Residential Gross Densities for TDR Receiving Areas: Minimum- 2.5 RAC; Maximum- 4 RAC



201 N. Stone Avenue, Tucson, AZ 85701
(520) 724-9000
www.pima.gov/developmentservices

BIOLOGICAL IMPACT REPORT

(Not applicable for rezonings that require a site analysis)

The Biological Impact Report assists staff in assessing a proposed project's potential to impact sensitive biological resources and is required by the Pima County Zoning Code Chapter 18.91. A project's design should conserve these important resources.

The report will include information provided by both Pima County Planning staff (Part I) and the Applicant (Part II).

INSTRUCTIONS FOR SAVING FORM: 1) Download form to computer. 2) Fill out form as applicable. 3) Save completed form to computer. 4) Submit completed form to Pima County Development Services. **If you fill out the form before you download it, the info you entered will not be saved.**

Project ID (case no., APN no., address, or other identifying info):

212-50-012L & -012M

Part I. Information Provided by Pima County Staff

Pima County Planning staff will provide the following information for the project site, as applicable:

1. Is the project located within any Maeveen Marie Behan Conservation Lands System (CLS) designation(s)? (Hold SHIFT for multiple selections)
Important Riparian Area
Biological Core
Multi-Use Management Area
2. Is the project within a CLS Special Species Management Area? No ☐
3. Is the project in the vicinity of any of the six Critical Landscape Linkages? No ☐
4. Is the project designated for acquisition as a Habitat Protection or Community Open Space property? No ☐
5. Is the project located within a Priority Conservation Area for any of the following species?
 - a. Cactus ferruginous pygmy-owl: No
 - b. Western burrowing owl: No ☐
 - c. Pima pineapple cactus: No ☐
 - d. Needle-spined pineapple cactus: No ☐

Part II. Information Provided by the Applicant

The Applicant will provide the following information to the best of their knowledge, as applicable:

1. Has the owner of the project site had any communications with County staff about Pima County potentially acquiring the property? No ☐
If yes, provide a summary of those communications:
2. The following species are of particular interest to Pima County conservation efforts; please fill out the following table to the best of your knowledge:

Species	Ever found on project site?	If yes, date of last observation/survey?	Future surveys planned?
Cactus ferruginous pygmy owl	No <input type="checkbox"/>		No <input type="checkbox"/>
Western burrowing owl	No <input type="checkbox"/>		No <input type="checkbox"/>
Pima pineapple cactus	No <input type="checkbox"/>		No <input type="checkbox"/>
Needle-spined pineapple cactus	No <input type="checkbox"/>		No <input type="checkbox"/>

Questions about this form?

Contact the Office of Sustainability and Conservation at (520) 724-6940.

Comprehensive Plan Amendment Application OR Concurrent Comprehensive Plan Amendment and Rezoning or Specific Plan Application

To electronically submit a rezoning application, complete the application and upload the required documentation. To submit an application in person to 201 N Stone Avenue, 1st-floor Planning, fill out the printable application and submit the application and attachments in electronic form.

If you have additional questions please visit our [Rezoning Application & Submittal Guidelines page](#).

Full Name: Stewart Title & Trust #1580

Mailing Address: 3939 E Broadway Blvd

City: Tucson

State: AZ

Zip Code: 85711

Email: erik.zwerk@stewart.com

Phone: 5203277373

Is the property owner the applicant? No, the owner is not the applicant

Applicant's Full Name: Paul Oland

Applicant's Address: 372 S Eagle Rd #284

City: Eagle

State: ID

Zip Code: 83616

Email: gpo@paradigmland.us

Phone: 5206644304

Tax Parcel Number: 212-50-012M

Acreage: 12

Present Zone: LIU-0.3 / GR-1

Proposed Zone: MLIU / CR-4

Comprehensive Plan Sub-region / Category / Policies: S-29

Letter of Authorization

If the applicant is not shown as the owner of the subject parcel a letter of authorization with a signature matching the APIQ must accompany the application at the time of submittal. For example, if the APIQ indicates ownership in a numbered trust such as Chicago Title and Trust #700, a signature of the Trust Officer is required along with a disclosure of the beneficiaries of the trust. If the APIQ indicates ownership to be in an LLC, LP, corporation or company, a signature from an officer with his/her title is required along with a disclosure of the officers of the entity.

Upload Letter of Authorization:



Subm 1 - Beneficiaries List.pdf



Subm 1 - Owner Auth Ltr (Signed).PDF

Site Analysis Document

Submit an electronic version of the site analysis document for a Site Analysis Rezoning or Specific Plan OR submit an electronic version of the required submittal documents as requested at the Pre-Rezoning Meeting for a Non-Site Analysis Rezoning.

Upload Site Analysis Document:



Subm 1 - Biological Impact Rpt.pdf



Subm 1 - Comp Plan Amend Narrative.pdf

Upload ESRI Shapefile or AutoCad DWG File

An ESRI Shapefile or AutoCad DWG file referenced to the Pima County GIS coordinate system for any zoning and/or land use boundary contained within a portion of a parcel or parcels that creates its own unique boundary that is not legally described.

Upload ESRI Shapefile or AutoCad DWG File



Subm 1 - Boundary.dwg

Terms and conditions

- I confirm the information provided is true and accurate to the best of my knowledge. I am the owner of the above described property or have been authorized by the owner to make this application. (By checking the box, I am electronically signing this application.)

For Electronic Submittal:

A rezoning case will be opened and an email containing an invoice with the case number and instructions for making payment through the online payment portal will be sent to the applicant within 2 business days.

Attendance to a *Pre-Rezoning meeting* is a pre-requisite to rezoning application submittal. The Pre-Rezoning meeting is scheduled at 201 N. Stone Avenue, 2nd floor on the 3rd Wednesday of the month beginning at 9:00 am.



TO: Chris Poirier, Deputy Director
Pima County Development Services Dept.

FROM: Paul Oland

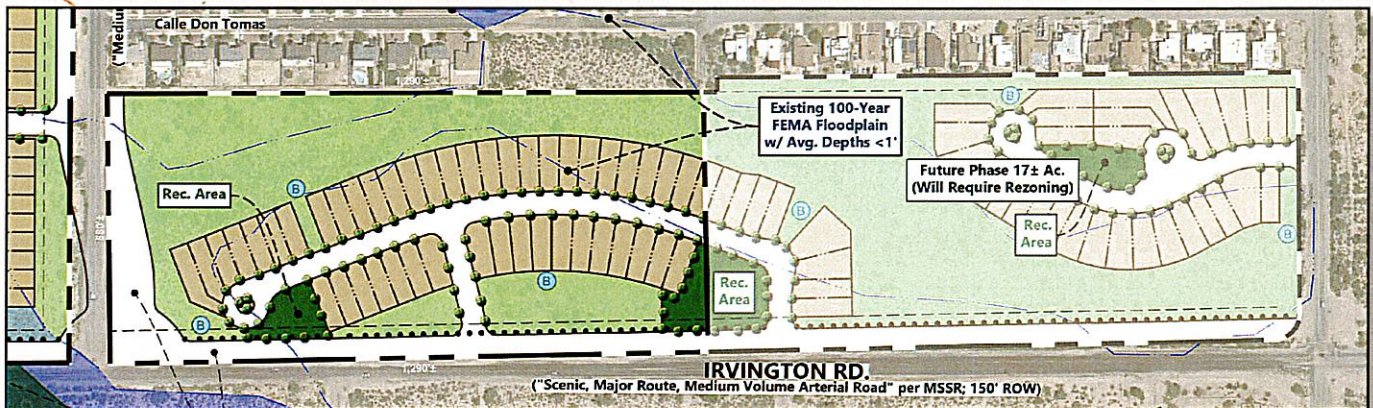
PROJECT: Irvington & Kinney NEC
Comprehensive Plan Amendment Request

DATE: 4/30/2025

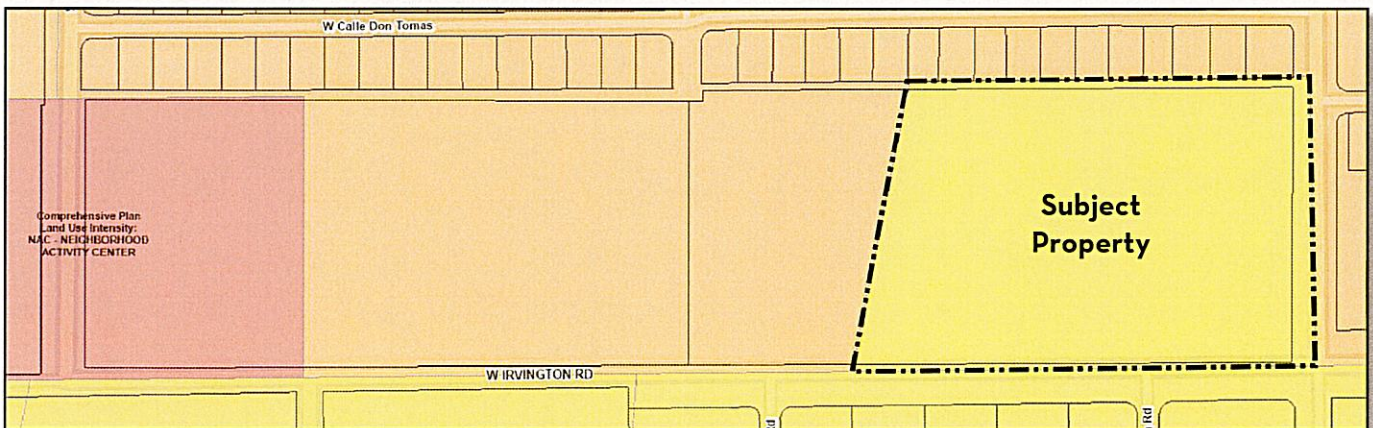
PROJECT #: 19axi01

Dear Mr. Poirier,

We are pleased to present this request for an amendment to the Pima County Comprehensive Plan to allow development of this infill parcel along Irvington Road between Kinney Road and Camino de Oeste. The overall proposed neighborhood is roughly 34 acres and is planned to be the next phase of the Meritage Homes development that is already under construction west of Kinney Road. The western 17 acres of the neighborhood is already zoned CR-4, so we'll be submitting a rezone request for the eastern 17 acres to match the western half. The conceptual site plan below shows the areas described.



- All but 12 acres of the neighborhood is already designated as MLIU in the Comprehensive Plan, so this request is to amend that remaining 12 acres to MLIU to match the rest of the proposed neighborhood. This 12-acre area is a logical and appropriate extension of the MLIU land use designation that surrounds the property on three sides:



As such, we respectfully request this Amendment, in anticipation of a rezoning to be submitted shortly.

**A. Arizona Growing Smarter / Plus**

Smart Growth America along with the American Planning Association, Urban Land Institute, and many other planning organizations, generally agree on ten core smart growth principles. Principles applicable to this project are listed below, along with Smart Growth America's explanations of each principle and our follow-up comments about how this project supports them.

- Create a Range of Housing Opportunities and Choices.
 - ✓ A housing shortage exists in the Tucson region. This proposed neighborhood will provide more housing options for first-time and early move-up homebuyers who may find their housing affordability options limited in other parts of Town.
- Take Advantage of Compact Building Design. Strengthen and Direct Development Towards Existing Communities. Efficient Use of Land. Infill.
 - ✓ This project is infill development and thus makes use of existing infrastructure. That in turn benefits the County and utility providers by adding additional customers without the need for much additional infrastructure to maintain.
- Create Walkable Neighborhoods.
 - ✓ The neighborhood will provide sidewalks along all internal streets, and connections to any adjacent sidewalks within adjacent public rights-of-way.
- Provide a Variety of Transportation Choices.
 - ✓ Sun Tran Route 430 runs along Irvington Road and Camino de Oeste, adjacent to this property, providing access to Downtown Tucson. Route 486 is nearby, providing weekday express access between Downtown Tucson and the communities of Why and Ajo.
- Foster Distinctive, Attractive Communities with a Strong Sense of Place. Preserve Open Space, Farmland, Natural Beauty, and Critical Environmental Areas.
 - ✓ While not critical open space from an environmental standpoint, the floodplain coursing through this property will be controlled and protected. The property is not within the Conservation Lands System.
- Mix Land Uses.
 - ✓ This property is most appropriate for development of much-needed housing in the southwest sector of the Tucson metropolitan area. That will contribute to the success of non-residential developments in the vicinity.
- Make Development Decisions Predictable, Fair, and Cost-Effective.
 - ✓ This Property is surrounded on three sides by residential neighborhoods of similar density to what is proposed onsite. Allowing this property to develop in the same manner is predictable from a land use standpoint, is fair from a compatibility and impact standpoint, and makes cost-effective use of the significant investment of public tax dollars in roadway and utility infrastructure already existing along the project perimeter.

**B. Implementation of Adopted Plan Policies**

- Chapter 3.1 Goal 1 Policy 2d: Promote the integrated and efficient use of infrastructure and services.
 - ✓ As stated above, a significant investment of public tax dollars has already been made in roadway and utility infrastructure along the project frontage. To maximize the tax base value of that investment, properties such as this one should be developed at an appropriate intensity in consideration of their immediate surroundings.
- Chapter 3.1 Goal 1 Policies 4 & 6 and Chapter 3.2 Goal 1 Policy 1: Support land uses, densities, and intensities appropriate for the urban, suburban, and rural areas of the unincorporated County. Promote a compact form of development in urban and suburban areas where infrastructure is planned or in place and the market is receptive. Promote efficient growth in urban, suburban, and rural areas compatible with each area's specific scale, character, and identity in areas where infrastructure is planned or in place.
 - ✓ All the necessary infrastructure is in place to support this project, and market demand for additional housing options and volume remains high.
- Chapter 3.2 Goal 1 Policy 1: Promote efficient growth in urban, suburban and rural areas compatible with each area's specific scale, character and identity in areas where infrastructure is planned or in place.
 - ✓ A neighborhood of single-family homes at this location will make efficient use of the existing infrastructure in adjacent rights-of-way. The land use is compatible with surrounding areas, most of which are developed residentially as is proposed onsite.
- Chapter 3.2 Goal 2 Policy 1: Utilize infill development to strengthen existing neighborhoods, create the higher density necessary to support desirable services, increase the tax base, and make our communities more efficient without being disruptive to existing neighborhoods.
 - ✓ This project is infill residential development, which will support businesses in the vicinity without disrupting other nearby residential areas.
- Chapter 3.5 Goal 1 Policy 1: Ensure a safe, diverse, and quality housing supply for all income ranges for existing and future populations.
 - ✓ This project will add to the supply of quality housing options for existing and future residents.
- Chapter 4.4 Goal 1 Policy 3: Encourage growth in areas with or in close proximity to existing infrastructure.
 - ✓ Development within this property will be served by the existing infrastructure in and along Irvington Road, Kinney Road, and Camino de Oeste.
- Chapter 4.9 Goal 1 Policy 5 and Goal 2 Policies 1 & 2: Require that drainage improvements are consistent with the overall character of the area and do not create nor worsen existing drainage problems. Continue to require new development to comply with all applicable requirements of the Floodplain Management Ordinance addressing the impact of development on flooding, erosion, and riparian habitat. Continue to require all new developments to comply with all applicable provisions establishing minimum standards for site grading, site drainage and design included in the Pima County Building and Zoning codes.
 - ✓ Any necessary flood control structures will be improved as necessary for this development to the satisfaction of the Pima County Regional Flood Control District.

**C. Applicable Special Area Policies and/or Rezoning Policies**

The subject property is located within Special Area Policy S-29, the Southwest Infrastructure Plan. This policy encourages development that is compatible with existing and planned infrastructure, while also aligning with regional land use goals for balanced growth. Key considerations under this policy include:

- Coordination with Infrastructure Plans:
 - ✓ The proposed rezoning supports infill and redevelopment objectives in areas where public infrastructure is planned or already in place, including proximity to sewer lines, water service, and significant roadways such as Irvington Road and Kinney Road.
- Utility Service Requirements:
 - ✓ As part of the rezoning process, the applicant will provide letters of intent to serve from both Tucson Water and the Pima County Regional Wastewater Reclamation Department (RWRD), confirming the ability to extend water and sewer infrastructure to the site.
- Growth Compatibility:
 - ✓ The proposed MLIU land use designation (and upcoming CR-4 rezoning request) aligns with the policy's goal of promoting medium-density housing in growth corridors, while respecting surrounding development patterns and available services.
- Open Space & Environmental Planning:
 - ✓ The development will incorporate design principles consistent with the Southwest Infrastructure Plan's intent to protect natural drainageways, minor washes, and community character.

D. Consistency with SDCP Maeveen Marie Behan Conservation Lands System ("CLS")

The property is not within the Conservation Lands System.

E. Impact on Existing Nearby Land Uses

This project will have little negative impact on surrounding land uses since surrounding areas are all either undeveloped or residential in nature. The closest neighbors are within the Tucson Mountain Village II subdivision to the north, which has no open space and an antiquated grid street design. The proposed neighborhood will provide an open space corridor for the existing wash, and will also provide landscape buffers as required by Pima County.

Thank you for your consideration of this Comprehensive Plan amendment application. Please don't hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Olandp', written over the printed name.

Paul Olandp



201 N. Stone Avenue, Tucson, AZ 85701
(520) 724-9000
www.pima.gov/developmentservices

BIOLOGICAL IMPACT REPORT

(Not applicable for rezonings that require a site analysis)

The Biological Impact Report assists staff in assessing a proposed project's potential to impact sensitive biological resources and is required by the Pima County Zoning Code Chapter 18.91. A project's design should conserve these important resources.

The report will include information provided by both Pima County Planning staff (Part I) and the Applicant (Part II).

INSTRUCTIONS FOR SAVING FORM: 1) Download form to computer. 2) Fill out form as applicable. 3) Save completed form to computer. 4) Submit completed form to Pima County Development Services. **If you fill out the form before you download it, the info you entered will not be saved.**

Project ID (case no., APN no., address, or other identifying info):

212-50-012L & -012M

Part I. Information Provided by Pima County Staff

Pima County Planning staff will provide the following information for the project site, as applicable:

1. Is the project located within any Maeveen Marie Behan Conservation Lands System (CLS) designation(s)? (Hold SHIFT for multiple selections)
Important Riparian Area
Biological Core
Multi-Use Management Area
2. Is the project within a CLS Special Species Management Area? No ☐
3. Is the project in the vicinity of any of the six Critical Landscape Linkages? No ☐
4. Is the project designated for acquisition as a Habitat Protection or Community Open Space property? No ☐
5. Is the project located within a Priority Conservation Area for any of the following species?
 - a. Cactus ferruginous pygmy-owl: No
 - b. Western burrowing owl: No ☐
 - c. Pima pineapple cactus: No ☐
 - d. Needle-spined pineapple cactus: No ☐

Part II. Information Provided by the Applicant

The Applicant will provide the following information to the best of their knowledge, as applicable:

1. Has the owner of the project site had any communications with County staff about Pima County potentially acquiring the property? No ☐
If yes, provide a summary of those communications:
2. The following species are of particular interest to Pima County conservation efforts; please fill out the following table to the best of your knowledge:

Species	Ever found on project site?	If yes, date of last observation/survey?	Future surveys planned?
Cactus ferruginous pygmy owl	No <input type="checkbox"/>		No <input type="checkbox"/>
Western burrowing owl	No <input type="checkbox"/>		No <input type="checkbox"/>
Pima pineapple cactus	No <input type="checkbox"/>		No <input type="checkbox"/>
Needle-spined pineapple cactus	No <input type="checkbox"/>		No <input type="checkbox"/>

Questions about this form?
Contact the Office of Sustainability and Conservation at (520) 724-6940.

Apr. 30, 2025

Pima County Development Services
201 N. Stone Ave.
Tucson, AZ 85701

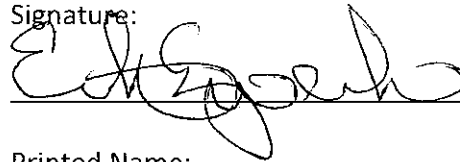
**Re: Irvington & Kinney NEC (APNs 212-50-012L & -012M)
Comprehensive Plan Amendment and Rezoning Requests**

To Whom it May Concern:

This letter serves as authorization for Paradigm Land Design LLC to represent Stewart Title & Trust #1580 in the entitlement application affecting the property referenced above.

Stewart Title & Trust #1580

Signature:



Printed Name:

Erik Zuork

Title:

Trust Officer

Stewart Title & Trust #1580
Beneficiaries List

Seymour Family LLC
Estelle Elliott
Ted Elliott