

LEGEND

-  Rezoning Site
-  Designated Pima County Trail from Pima County Regional Trail System Master Plan
-  Public Park
-  Tucson Audubon Society

NOTE:
There are no designated trail heads within the area illustrated on this exhibit.

Jim Portner, Agent for Owner
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TUCSON, ARIZONA 85749
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PROJECTS INTERNATIONAL, Inc.
STRATEGIC GUIDANCE
ENTITLEMENT PROCESSES
LOCAL ADVICE & COUNSEL

GRS
LANDSCAPE ARCHITECTS, LLC

Red Point Development, Inc.
SEC LINDA VISTA BLVD & THORNYDALE ROAD
(Ownership Entity: Lawrence C. Leung, Inc.)
REZONING: SR to CR-5

EXHIBIT I-H.1
RECREATION AND TRAILS
PAGE 40

I. CULTURAL RESOURCES, ARCHAEOLOGICAL & HISTORIC SITES

1. Records Check and Letter Report

A cultural resources records review was completed for subject property by SWCA Environmental Consultants in October, 2014. The search reviewed the existing records in the AZSITE database, as well as the National Register of Historic Properties (NRHP). These sources indicate that no archaeological sites had been previously documented on the subject property. The summary findings from the SWCA records review is included here as Exhibit I-I.1.

a. Prior Field Surveys

Per the above, the only prior archaeological survey that included the property was the Northern Tucson Basin Survey (NTBS) conducted by the Arizona State Museum (ASM) and the University of Arizona (UA) in the early/mid 1980's.

b. Previously Recorded Archaeological or Historic Resources

No archaeological or historic sites of significance were found in the aforementioned records review.

c. Probability of Buried Resources

There is a low probability of buried resources based upon the aforementioned records review.

d. Recommendation as to Future Surveys

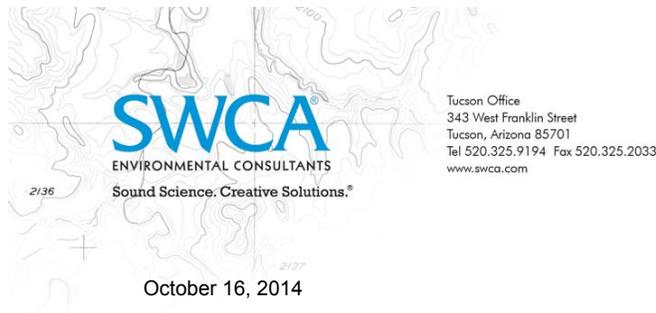
Due to the fact that the prior NTBS survey methodology would not be considered adequate by current State Historic Preservation Office (SHPO) standards, the SWCA study recommends that a new survey, meeting currently accepted survey standards and protocols, be completed for the property. It is the developer's intent to complete this survey at the time of subdivision platting.

2. On-Site Archaeological or Historic Resources

Not applicable per the above findings.

Exhibit to Follow

Section I - Site Inventory



Larry Kreis
Red Point Development
8710 North Thornydale Road, Suite 120
Tucson, Arizona 85742

Re: Cultural Resources Records Review for the Linda Vista and Thornydale Property,
Unincorporated Pima County, Arizona

Dear Larry:

On behalf of Red Point Development, Inc., SWCA Environmental Consultants (SWCA) has completed a cultural resources records review of the Linda Vista and Thornydale property (Parcel 225-02-004M) located on North Thornydale Road, south of West Linda Vista Boulevard, in unincorporated Pima County, Arizona. The purpose of the study is to provide information on whether the property has been previously surveyed for cultural resources, to identify any known archaeological or historical resources on the property, to assess whether the property may contain buried archaeological resources not visible from the surface, and to make an informed recommendation as to whether archaeological survey of the properties is warranted. We understand that this study is a required component of the Site Analysis report that is to be provided to Pima County as part of an application to rezone the property.

The 18-acre Linda Vista and Thornydale property is a privately held parcel in Section 20, Township 12 South, Range 13 East, Gila and Salt River Baseline and Meridian, Pima County, Arizona, and can be found on the Jaynes, AZ 7.5-minute U.S. Geological Survey topographic quadrangle (Figure 1).

SWCA consulted the AZSITE database for previously conducted surveys and previously recorded sites within the subject property. The National Park Service National Register Information Systems Database was also consulted for National Register of Historic Properties (NRHP)-listed properties or districts. The records search showed that no archaeological sites have been previously documented in the project area.

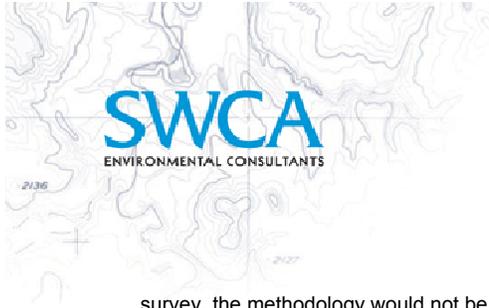
The only archaeological survey of the property took place as part of the Northern Tucson Basin Survey (NTBS), which was conducted by the Arizona State Museum (ASM) and the University of Arizona in the early to middle 1980s, and consisted of a 1,800-square kilometer (695-square mile) study area that stretched from the northern edge of the Tucson Mountains to Picacho Peak.¹ The description of NTBS field methods states that "In obtaining large-scale patterns, speed and efficiency in the field observation occasionally required compromise with precision and detail."² Although much was learned about the regional archaeology as a result of the

¹ Madsen, J.H., P.R. Fish, and S.K. Fish (eds). 1993. *Northern Tucson Basin Survey: Research Directions and Background Studies*. Archaeological Series No. 182. Tucson: Arizona State Museum, University of Arizona.

² Madsen et al., 1993, pp. 13.

Exhibit I-I.1 (Page 1 of 2) SWCA Records Review Summary Letter of Findings

Section I - Site Inventory



survey, the methodology would not be considered adequate to rely on for current review by the State Historic Preservation Office (SHPO)³ and most other review agencies. Although the Linda Vista and Thornydale property is within the portion of the NTBS area that was subject to full-coverage survey, the transect spacing for survey was 30 meters,⁴ and the ASM currently specifies a maximum spacing of 20 meters for full-coverage survey. The crews were equipped with topographic maps and aerial photographs, but not more modern mapping technologies (e.g., global positioning system [GPS] units), and the project was not focused on evaluating the historical significance (i.e., NRHP eligibility) of individual sites.

Based on Arizona Geological Survey maps, the Linda Vista and Thornydale property lies upon middle to late Pleistocene Piedmont alluvium.^{5,6} The potential for intact buried archaeological resources not visible on the surface is low.

Given that the one previous survey of the Linda Vista and Thornydale parcel was part of a project which would not adequately meet SHPO requirements, we recommend that an archaeological survey that meets the currently accepted survey standards be conducted of the property.

Thank you for providing us with the opportunity to work with you again. Please contact me at (520) 325-9194 if you have any questions at all regarding this work.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jerome Hesse", is written over a light blue horizontal line.

Jerome Hesse
Cultural Resources Lead, Tucson

Attachment A: Figure 1

³ State Historic Preservation Office (SHPO). 2004. *SHPO Position on Relying on Old Archaeological Survey Data*. Guidance Point 5. Phoenix: Arizona State Parks.

⁴ Madsen et al., 1993, pp. 21.

⁵ McKittrick, M.A. 1988. *Surficial Geologic Maps of the Tucson Metropolitan Area*. Open-File Report No. 88-18. Tucson: Arizona Geological Survey.

⁶ Pearthree, P.A., and T.H. Biggs. 1999. *Surficial Geology and Geologic Hazards of the Tucson Mountains, Pima County, Arizona*. Open-File Report No. 99-22. Tucson: Arizona Geological Survey

J. AIR QUALITY

1. Proposed Industrial Facilities

Not applicable; there are no Industrial facilities planned or proposed for this development.

K. COMPOSITE MAP

1. Description of Major Characteristics

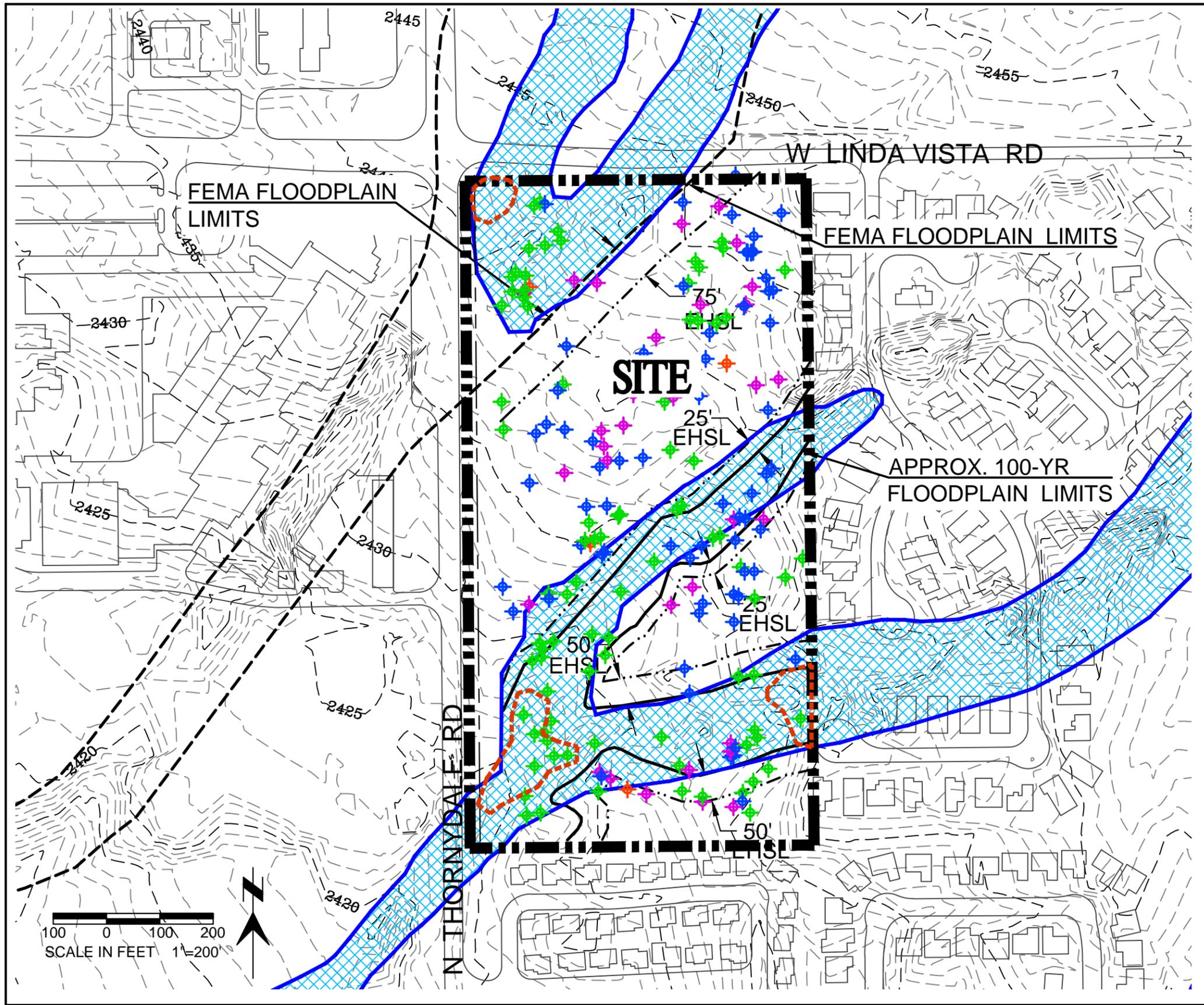
The site is generally unremarkable in terms of landform or significant features, except for the fact that it possesses a rich stand of natural desert vegetation and designated habitat and important riparian areas. The specific characteristics cited in the Site Analysis Guidelines are respectively addressed on Exhibit I-K.1-3 (Composite Map) as follows:

1. **Topography.** There are no restricted peaks and ridges, rock outcrops, talus slopes, or slopes of 15% or greater. As such, none of these topographic features are depicted on the Composite Map exhibit. The Exhibit will contain only the 1' contour interval mapping of the site.
2. **Hydrology.** The Composite Map exhibit will contain the following identified items from the checklist: (a) the 100-year regulatory floodplains traversing the site in the existing condition; (c) the federally-mapped FEMA floodway traversing the site's northwest corner; and (d) the regulated riparian habitat areas.

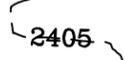
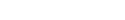
The following items from the checklist do not exist on the property and so will not be depicted on the Composite Map: (b) sheet flow areas; and (e) lakes, ponds, springs, wetlands, etc.

3. **Biological Resources.** The Composite Map exhibit will contain only the following three (3) identified items from the checklist: (a) all saguaros, mapped and categorized based on their height; (b) ironwood trees; and (e) areas of significant or important vegetation.

The following items from the checklist do not exist on the property and so will not be depicted on the Composite Map: (c) pima pineapple cactus; and (d) needle-spined pineapple cactus.



LEGEND

-  Rezoning Site
-  Existing Condition Topographic Contour (1' Interval)
-  Erosion Hazard Setback Limit
-  CMG approximate 100-Year Floodplain Limit
-  FEMA Floodplain Limit
-  Mapped Riparian Habitat Important Riparian Areas with Xeroriparian "C"
-  Saguaro ≤ 6' in height
-  Saguaro >6' - 18' in height
-  Saguaro >18' in height
-  Ironwood Tree
-  Vegetation of Special Note for Scenic Value or Buffering

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EXHIBIT I-K.1-3
 COMPOSITE MAP
 PAGE 45

SECTION II:
Land Use Proposal

A. PROJECT OVERVIEW

The proposed rezoning can rightly be viewed as an infill development that will fit well within its surrounding, urbanizing context and will make efficient use of the existing network of public and utility infrastructure that is already in-place.

1. Requested Zoning Designation

Because the Project is not proposed to include multiple zoning districts, the Site Analysis requirements of Section II-A.1. do not apply. The requested zoning designation for the entire rezoning site is CR-5.

2. Characteristics of Proposed Development

The site will be developed as a single-family residential subdivision, the intent of which is to be generally consistent in density and character with the existing subdivisions already in place to the east, south, and southeast. There is, however, one notable distinction between the present proposal and these past subdivisions. The latter were subdivided and constructed in the 1980's and 1990's, when far less restrictive regulations were in place to protect natural drainage features and wildlife habitat areas. As a result, many of these prior subdivisions were entirely mass graded and their natural drainages either narrowed and channelized or realigned altogether. The residential subdivision proposed under this rezoning will essentially preserve the on-site natural drainageways in their natural state, except for necessary street crossings, as well as fully honor the Conservation Lands System (CLS) thresholds for the site through a combination of on-site and off-site set-asides.

Beyond this basic premise, the following particulars apply:

a. Project Design & Response to Site Constraints

The site's major constraints are natural and environmental ones, most notably pertaining to habitat conservation and the presence of the natural washes that traverse the property.

The majority of the site is designated as *Multiple Use Management Area (MUMA)* under the Maeveen Marie Behan Conservation Lands System (CLS), with portions of it classified as *CLS Important Riparian Area (IRA)*. The property further subject to the CLS Special-Species Management overlay, thereby requiring that an 80% preservation threshold be met for the site.

Beyond these habitat considerations, the site contains numerous saguaros and ironwood trees, thereby necessitating special care in applying and executing the Native Plant Preservation Ordinance (NPPO).

Lastly, the site is traversed by several natural drainages, all of which are regulatory in nature (i.e. possessing regulatory flows greater than 100 cfs in the 100-year event).

The Preliminary Development Plan (PDP) presented below in Section II.B responds to these natural constraints by employing significant set-asides for both the CLS and regulatory-floodplain constraints identified above. The residential lots are clustered in a way that respects the 100-year regulatory floodplains while also employing supplemental on-site set-asides that buffer the adjacent residents and which accrue towards overall CLS compliance.

In the end, the proposed subdivision design for the project serves as a relative contrast to the existing nearby subdivisions that were developed under older, less restrictive preservation and protection regulations.

- b. Conformance with Comprehensive Plan (Pima Prospers), etc.

This Project, as proposed, will comply with Pima Prospers (the Pima County Comprehensive Plan) and all applicable Rezoning Policies.

This Project complies with its Designated Land Use Intensity Category.

The Property is designated as a combination of Neighborhood Activity Center (NAC) and Medium Intensity Urban (MIU). The Project will provide a single family residential subdivision of the same basic character and intensity of those already adjacent to it and within the larger Thornydale Road corridor. While the original comprehensive plan request for this property contemplated a commercial corner (within the NAC district) together with the proposed residential component, it became apparent during design that the significant hydrologic and riparian-habitat constraints impacting the planned commercial area made it unviable. The proposed CR-5 zoning request for the residential subdivision is permitted under the MIU category and, further, is consistent with the established zoning construct surrounding the property.

The residential lots within the NAC district will be consistent with those provided in the MIU area. However, in keeping with the principle that NAC districts provide direct pedestrian connectivity to adjacent neighborhoods, the proposed PDP provides a minimum 4' wide pedestrian path from the subdivision, through the NAC area, and across the Conservation Lands System (CLS) set-aside area located at the extreme northwest corner of the project. This path will provide direct connectivity to the major street intersection, all nearby commercial uses, and the high school campus.

The CLS set-aside areas provided on the PDP are consistent with the applicable rezoning policies for the property per Case No. Co7-13-03 (and attendant Resolution No. 2014-114) These policies are found in their entirety in Section I.A.2.c on page 2 of this Site Analysis.

This Project complies with the County's Pima Prospers Use of Land (Chapter 3) and Physical Infrastructure Connectivity (Chapter 4) policies. The pertinent policies are as follows: Land Use Element (Section 3.1), Environmental Element (Section 3.4), Housing & Community Design Element (Section 3.5), and Transportation Element (Section 4.1).

Land Use Element (Section 3.1)

The proposed project works substantially toward the established Goal 1 objective (p.3.2) of integrating land use with physical infrastructure and resource conservation to insure long-range viability of the region. The requested rezoning integrates with the existing, established, or already-planned transportation, wastewater, potable water, and recreational infrastructure resources present adjacent to the property and within the larger Thornydale Road corridor. It represents a quintessential infill development that, by definition, works off of this existing infrastructure rather than requiring the further expansion of it. The continued residential densification of the Thornydale Road corridor through infill projects such as this one takes advantage of these available efficiencies and enhances the opportunity for expanded multi-modal transportation and transit options.

Environmental Element (Section 3.4)

The proposed project is in full compliance with the Conservation Lands System (CLS), its stated Goal 1 (p.3.23) objective of conserving and protecting natural resources, together with its enumerated Policies (pp. 3.23 thru 3.31). The subject property was part of an extensive exercise, during the comprehensive plan amendment phase, to establish site-specific thresholds for on-site and off-site CLS mitigation so as to insure full compliance with all established thresholds associated the Special Species Management overlay of the System. Four (4) separate properties (including the subject site) were evaluated in holistic fashion to integrate both CLS parameters and neighborhood concerns into a global solution that recognized and addressed both. The proposed rezoning is the next step in effectuating this holistic solution and bringing it to fruition.

Housing and Community Design Element (Section 3.5)

The proposed project furthers the Goal 8 (p. 3.45) objective of providing new development that is generally compatible and scale-appropriate, as well as the Goal 10 (p. 3.46) objective of ensuring development that reflects the character and sense of place of its given area. This infill project has, from the onset, pursued a very simple goal: provide a single-family residential use that, as best as possible, general fits within, respects, and essentially mirrors the type, character, and density of the existing residential development that already surrounds it. While the actual residential component of the proposed project will satisfy this basic objective, the overall development will represent a significant enhancement over the established surrounding residential context. While the existing adjacent

subdivisions were often entirely mass-graded and employed channelized drainages, today's more restrictive preservation and regulatory policies yield subdivisions with significant natural features, open space elements, and significant perimeter buffering, thereby creating a more respectful and sensitive siting of the new project within the established suburbanized context.

Transportation Element (Section 4.1)

The proposed project furthers the Goal 1 (p. 3.45) objective of furthering a comprehensive and multi-modal transportation system. The Thornydale Road corridor is clearly one of the most significant north-south transportation arteries within the overall County transportation system. Multi-modal objectives can only be met by fostering the growth, intensification, and residential densification of such corridors. At present, this important corridor is, somewhat remarkably, served by one and only one public transit route. And this route is only a Sun *Shuttle* service, i.e. not a full-size Sun Tran bus. One's personal views on growth and development notwithstanding, it is simple fact that achieving truly multi-modal, transit-rich corridors can only be achieved by significant densification and intensification of use. The proposed rezoning is one small step in that direction, with the need for many more in the future.

This Project complies with the County's applicable Rezoning Policies. As mentioned in Section I.A.2.c (pp. 1-2) of this Site Analysis, the subject property was approved for a combination of Neighborhood Activity Center (NAC) and Medium Intensity Urban (MIU) under Case No. Co7-13-03. Four (4) rezoning policies were stipulated for the site via this approved amendment. The proposed residential use for the project, its design and its open space/habitat set-asides are all in accordance with the prescribed policies.

c. Neighbor Issues & Response

The current property owner and applicant (Lawrence C. Leung, Inc. and Red Point Development, Inc.) heard and accommodated neighboring property owner concerns during the recent Comprehensive Plan Amendment process for this property (Case No. Co7-13-03), the application of which was ultimately approved by the Board of Supervisors in February, 2014. The conditions of approval attached to that amendment (which were enumerated in Section I.A of this Site Analysis) and have been reflected in this rezoning proposal and attendant PDP through the use of substantial natural buffers to protect the adjacent residential subdivisions, as well as the set-aside of significant on-site areas and the commitment to supplemental off-site mitigation, so as to fully satisfy all applicable CLS thresholds.

The rezoning applicant is committed to further working further with neighborhood representatives and leaders so as to fully inform them of the proposed rezoning application and the specifics of the residential subdivision planned for the property. These discussions and interactions will be on-going through the rezoning process and we will insure that Pima County staff is kept abreast of their progress.

d. Impact on Existing Land Uses in the Surrounding ¼ Mile Area

The proposed Preliminary Development Plan (PDP) depicts a residential subdivision that is generally similar in type and character to the existing neighborhoods that are already in place to the east, south, and southeast. As alluded to above, however, the degree of on-site habitat protection and the preservation of existing natural washes inherent in the proposed PDP exceeds that which characterizes the prior adjacent subdivisions.

e. Contribution to Smart Growth Principles

The proposed rezoning is consistent with, or furthers, several of the Smart Growth Principles as identified by the Smart Growth Network (SGN). These are individually discussed below:

Mix of Land Uses

Given the emerging urbanization trend in the area and taking into account the property's immediate context, the site is best developed as a residential subdivision. While the site was originally envisioned (at the comprehensive plan stage) to also contain a commercial corner, the significant habitat, riparian, and drainage constraints impacting the northwest corner of the site have effectively made this commercial usage unviable. With proper design, however, this residential subdivision will coexist well with its existing residential neighbors to the east and south, as well as with the established high-school and regional park uses to the west and southwest.

Take Advantage of Compact Building Designs

The project will promote higher density and intensity within the Thornydale Road corridor and locate the proposed residential lots in a clustered, compact spatial arrangements that afford opportunities for efficient on-site infrastructure while, at the same time, creating significant open space elements and CLS set-asides that are meaningful in both size and continuity.

Multi-Modal Transportation Opportunities

Higher density development always contributes to larger regional opportunities for multi-modal transportation. The Thornydale Road corridor functions as important north-south transportation artery and is