



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

RE: Co7-14-02 Signature Homes by Miramonte, LLC – W. Hardy Road Plan Amendment

Dear Supervisor Miller and Board Members:

Thank you for the opportunity to provide comments on the proposed W. Hardy Road Comprehensive Plan Amendment (Co7-14-02 Signature Homes by Miramonte, LLC – W. Hardy Road Plan Amendment).

This 20-acre parcel falls within the Conservation Lands System (CLS) of the Comprehensive Land Use Plan. The entire parcel has an underlying Multiple Use Management Area designation with a Special Species Management Area (SSMA) overlay throughout. The CLS open space guidelines for SSMA call for at least 80% open space. CLS guidelines also 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 on and/or off-site mitigation are included as a condition of approval 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*. **These guidelines were also approved by the Pima County Planning & Zoning Commission as rezoning policies when they considered this Comprehensive Plan Amendment at their August 27, 2014 meeting.** 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.

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