



## Coalition for Sonoran Desert Protection

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September 16, 2013

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

Supervisor Ray Carroll and Members  
Pima County Board of Supervisors  
130 W. Congress St., 11th Floor  
Tucson, AZ 85701

### **RE: Co7-13-07 Title Security of Arizona TR 2055 - E. Tanque Verde Road Plan Amendment**

Dear Supervisor Carroll and Boardmembers:

Thank you for the opportunity to comment on the Comprehensive Plan Amendment for the proposed Desert Willow Ranch development (Co7-13-07 Title Security of Arizona TR 2055 – E. Tanque Verde Road Plan Amendment).

We understand that the Comprehensive Plan Amendment application submitted for this property is being evaluated in conjunction with an already approved Conservation Subdivision tentative plat approved for the property by Pima County Development Services in March 2013. We have reviewed both the application and the addendum (submitted by the applicant on July 5, 2013) to the original Comprehensive Plan Amendment application.

While we appreciate the applicant's stated commitment to conserve the Important Riparian Area (IRA) located outside of the proposed 53-acre amendment area to the "maximum extent possible," the proposed conservation guidelines for the IRA and Biological Core Management Area in the amendment area fall far short of the minimum conservation guidelines for these CLS land categories. We were also dismayed by the original amendment proposal that suggested to completely delete the IRA and Biological Core Management Areas in the amendment area. The CLS has been successfully implemented by the County for the past 13 years, with broad community support.

The Coalition recommends application of the Conservation Lands System (CLS) guidelines to the IRA and Biological Core Management Area within the amendment area. CLS guidelines state that development within IRAs preserve at least 95% of the IRA as natural undisturbed open space, and a minimum 80% open space in Biological Core Management Areas, or corresponding off-site mitigation.

We support the conclusions of Pima County's Office of Conservation and Sustainability related to this amendment application. This includes the enduring conservation values


of the wildlife habitat present on the property and a lack of support for any modification of the CLS guidelines in relation to this application. We also support the Planning and Zoning Commission, who voted in July to recommend open space set-asides percentages as part of the amendment application rather than wait until the rezoning stage for this to occur. In light of the fact that a Conservation Subdivision tentative plat has been approved at a lower density on this property, and presumably the applicant intends to simply amend the plat simultaneously with a rezoning request, establishing these percentages now will give the applicant ample time to prepare and plan for how to achieve these percentages, either through on-site set-asides, off-site mitigation, or a combination of both.

We also support the recommendations of the Regional Flood Control District (RFCD) that should the amendment be approved, all Pima County Regulated Riparian Habitat and floodplains in the amendment area remain as the Resource Transition land use category due to the enduring habitat value present on the property. Please note as well that RFCD recommends overall denial of the amendment request.

**In summary, we recommend that the Board of Supervisors specify that a minimum 95% IRA set-aside and 80% Biological Core set-aside be applied on this property at the time of the plan amendment, *assuring that the applicant will comply, at the earliest stage, and not further in the process at the rezoning.* Without these open space set-aside assurances and the condition recommended by the RFCD, the Coalition cannot support this amendment application at this time.**

Thank you again for the opportunity to comment on this Comprehensive Plan Amendment application. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Carolyn Campbell  
Executive Director