



Coalition for Sonoran Desert Protection

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November 18, 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 Sharon Bronson, District 3
Pima County Board of Supervisors
130 W. Congress, 11th Floor
Tucson, AZ 85701

RE: Co7-13-08 LANDMARK TITLE TR 18109 - W. SUNSET ROAD PLAN AMENDMENT

Dear Supervisor Bronson and Board Members:

Thank you for the opportunity to comment on the Comprehensive Plan Amendment for the proposed Sunset Road development - Co7-13-08. I submit these comments on behalf of the Coalition for Sonoran Desert Protection, comprised of 41 local, state, and national organizations working to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan.

This parcel contains multiple Conservation Lands System (CLS) categories under the existing Comprehensive Plan. These include Important Riparian Area (IRA), Multiple Use Management Area (MUMA), and Special Species Management Area (SSMA). According to the staff report, approximately 74.3 acres of the 77.9 acre property contain one or more of these CLS categories. CLS guidelines call for on-site conservation and/or off-site mitigation if development commences.

We support the conclusions of Pima County's Office of Conservation and Sustainability relating to this request that any future request for rezoning on this property "will be obligated to demonstrate, in detail, compliance with the CLS." We also support the recommendations of the U.S. Fish & Wildlife Service regarding full compliance with CLS policies, protection of adequate travel corridors, and on-site protection of foraging resources.

We understand that this proposal is unique in terms of Plan Amendment submission in a couple of ways. First, there is an approved SR plat for 22 units that has not yet been developed. And, second, the property owners currently have a detailed concept plan for the build-out of the property, should it be approved. We appreciate seeing this detail at this stage.

Coalition staff has had a number of meetings with the property owners and their representatives, most recently this past Thursday afternoon, November 14th, with Tucson Mountains Association representatives. While the meeting was productive, we still have concerns that the property falls short of CLS compliance, and that wash corridors on-site are insufficient for wildlife movement. To that end, we have requested

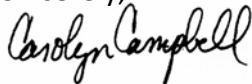
that the property owners agree to the following, and, if the Plan Amendment is approved, continue to work with the Coalition before the rezoning hearing:

1. Extend and widen the open space corridor in and around the eastern Important Riparian Area to better connect this open space to the open space to the south. This will be accomplished by working with the flow pattern from northeast to southwest.
2. Widen the open space on the eastern edge of the property to provide more north-south connectivity.
3. Provide more overall open space within the CLS categories of SSMA and MUMA.
4. Protect peaks and ridges on the property by ensuring that they will remain undeveloped.

Through these reconfigurations, the increase in open space areas will lead to better functionality and the achievement of CLS compliance. The property owners understand that this may result in fewer housing units. **Should the property owners agree, the Coalition can support this amendment; if they are unwilling, the Coalition recommends denial.**

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 written in a cursive, flowing style.

Carolyn Campbell
Executive Director