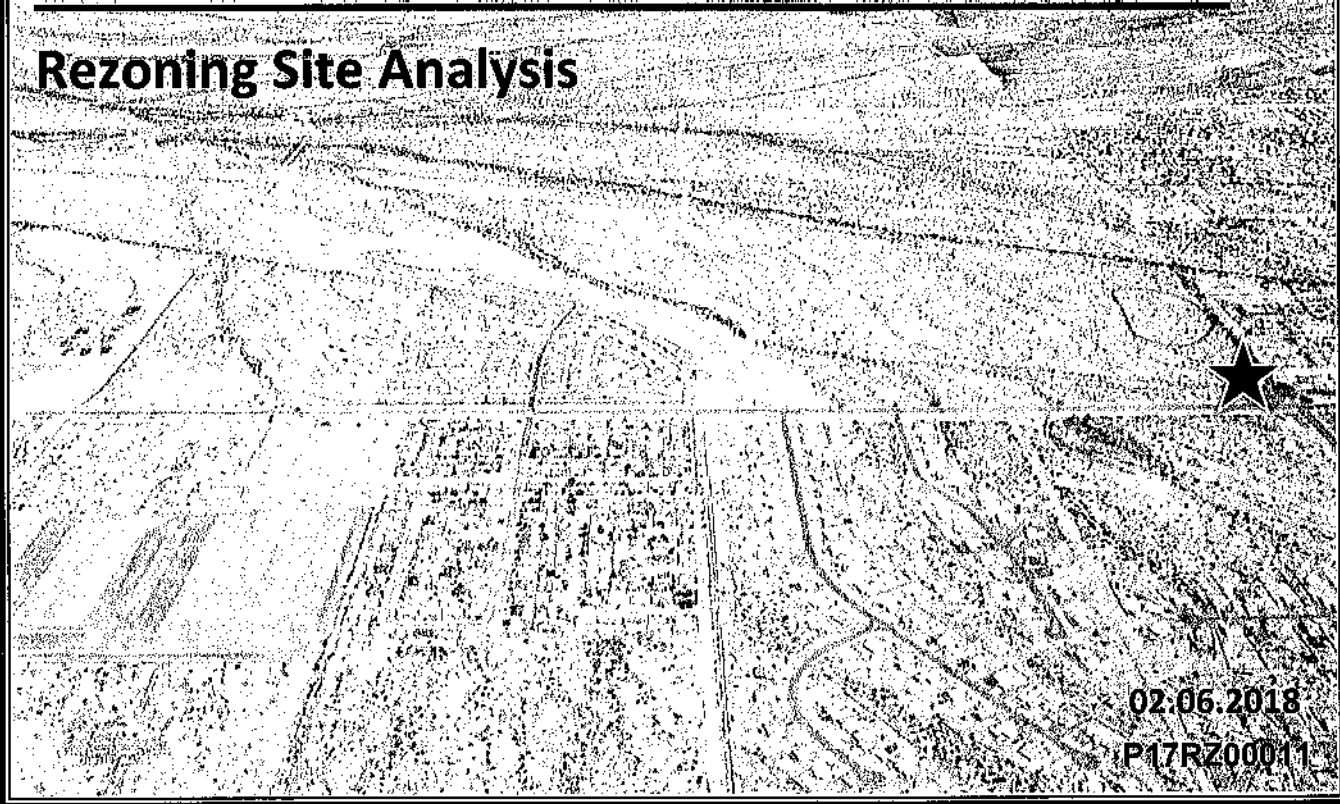


Tucson Mountain Ranch Neighborhood Commercial Corner

Rezoning Site Analysis



02.06.2018

P17RZ00011

Prepared For
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TABLE OF CONTENTS

Introduction 3

PART I: SITE INVENTORY

A. Existing Land Uses4
B. Topography & Grading14
C. Hydrology 16
D. Biological Resources 21
E. Viewsheds..... 37
F. Transportation..... 40
G. Sewers 45
H. Recreation and Trails..... 47
I. Cultural/Archaeological/Historic Resources 49
J. Air Quality..... 52
K. Composite Map 52

PART II: LAND USE PROPOSAL

A. Project Overview 54
B. Preliminary Development Plan (PDP)..... 58
C. Topography & Grading 61
D. Hydrology 63
E. Biological Resources 64
F. Landscape & Buffer Plan 68
G. Viewsheds..... 68
H. Transportation..... 68
I. On-Site Wastewater Treatment & Disposal 70
J. Sewers 70
K. Water..... 73
L. Schools..... 75
M. Recreation & Trails 75
N. Cultural/Archaeological/Historic Resources 75
O. Environmental Quality..... 76
P. Agreements 76

FIGURES & EXHIBITS

Figure 1	Arizona Game & Fish Department Environmental Tool	26
Figure 2	Arizona State Museum Records Check Letter	50
Figure 3	Pima County Wastewater Letter.....	71
Figure 4	Metro Water District, Water Availability Letter	74
Exhibit I-A-1	Regional Location Map.....	10
Exhibit I-A-2	Aerial Photograph.....	11
Exhibit I-A-3	Existing Land Uses & Approximate Densities	12
Exhibit I-A-4	Existing Zoning	13
Exhibit I-B-1	Topography & Slope Analysis.....	15
Exhibit I-C-1	Offsite Watershed.....	19
Exhibit I-C-2	Onsite Hydrology.....	20
Exhibit I-D-1	Vegetative Communities & Special Elements	23
Exhibit I-D-2	Protected Species and Riparian Areas	24
Exhibit I-D-3	Vegetative Densities	25
Exhibit I-E-1	Onsite Viewshed Analysis	38
Exhibit I-E-2	Offsite Viewshed Analysis	39
Exhibit I-F-1	Existing/Planned Offsite Streets	42
Exhibit I-F-2	Distances to Existing Drives/Intersection	43
Exhibit I-F-3	Public Transit.....	44
Exhibit I-G-1	Existing Public Sewer System	46
Exhibit I-H-1	Parks, Recreation Areas & Trails	48
Exhibit I-J-1	Composite Map.....	53
Exhibit II-A-1	Proposed Zoning	57
Exhibit II-B-1	Preliminary Development Plan	59
Exhibit II-B-1a	Preliminary Development Plan Expanded	60
Exhibit II-C-1	Approximate Areas to be Disturbed	62
Exhibit II-D-1	On-Site Hydrology	66
Exhibit II-E-1	Impacts to Biological Resources.....	67
Exhibit II-F-1	Preliminary Sewer Layout	72

APPENDICES

Appendix A	Preliminary Integrated Water Management Plan (PIWMP)
Appendix B	Site Photographs
Appendix C	Neighborhood Meeting Notes
Appendix D	Traffic Impact Study
Appendix E	Cultural Resources Survey
Appendix F	Commercial Design Manual
Appendix G	Architectural and Aesthetic Concepts

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INTRODUCTION

THE SOUTHWEST PLANNING SUBREGION

The Southwest Planning Subregion is located southwest of Tucson and includes roughly 800,000 acres (~1,250 square miles). It is bounded on the north by Tucson Mountain Park, on the south by Santa Cruz County and Mexico, on the east by Santa Cruz County and the Upper Santa Cruz Subregion, and on the west by the Tohono O’odham Nation. Major roads located in the subregion include Interstate 10, Ajo Highway, Sasabe Road, Valencia Road, and Sandario Road, among others.

An approximately six-mile wide strip of land exists between the Tucson Mountain Park and the Tohono O’odham Nation. Pima County Comprehensive Plan land use designations within this area are mixed, ranging from Community Activity Center and Medium Intensity Urban to Low Intensity Rural and Resource Transition. The balance of the Southwest Planning Subregion is designated as Medium or Low Intensity Rural.

PROJECT PROPOSAL

This proposal is to rezone 15.3± acres (664,000± square feet) currently designated as County Manufactured and Mobile Home Zone 1 (CMH-1) to Local Business Zone (CB-1). The 1.5 ± acre (66,000 ± square feet) parcel located on the northwest corner of Wade and Valencia Roads is already zoned as CB-1 and is not a part of this application. The proposal will provide the opportunity for commercial development to serve existing and future residential units in the area.

The Tucson Mountain Ranch property was subject to a block plat several years ago. The Tucson Mountain Ranch Cluster development has been submitted to the county and was approved on December 23, 2015 and extended to October 15, 2019 on March 1, 2017. This rezone will compliment that development by providing pedestrian and bike access between the developments.

PART I –SITE INVENTORY

I-A. EXISTING LAND USES

1. SITE LOCATION

The subject property is located southwest of Tucson near the State Route 86 corridor, and is identified as a portion of parcel number 210-15-1990 in Township 15 south, Range 12 east, Section 9. The project vicinity is characterized by a mixture of regulated and unregulated development and is undergoing rapid growth and change as many subdivisions in the vicinity continue to develop. Tucson Mountain Park is approximately three miles to the north and the San Xavier District of the Tohono O’odham Nation is two miles to the south. The Pascua Yaqui Nation is two miles to the southeast. Current planning efforts in the area include the Valencia Road improvements and the La Luna subdivision rezoning (Co9-04-25). Parcel Number 210-15-2000 is currently designated as CB-1.

Refer to Exhibit I-A-1 Regional Location Map.

2. EXISTING LAND USES, COMPREHENSIVE PLAN DESIGNATIONS, AND EASEMENTS

a) The subject property is currently vacant and undeveloped. The property has been previously used for grazing, which has reduced the amount of native vegetation occurring on the site. The site is used for illegal dumping, and has been for many years. In addition, ATV’s frequently trespass on the site.

b) Additional rights-of-way were granted for Valencia and Wade Roads during the original Tucson Mountain Ranch block plat.

c) The Comprehensive Plan designation for the property is Neighborhood Activity Center (NAC), which supports the requested rezoning.

3. AERIAL PHOTOGRAPH

Refer to Exhibit I-A-2 for an aerial photograph of the subject property.

4. EXISTING ADJACENT ZONING AND LAND USES

a) Existing Site Zoning

The subject property is currently zoned as County Manufactured and Mobile Home-1 Zone (CMH-1).

Existing Zoning within ¼ mile

North: County Manufactured and Mobile Home-1 Zone (CMH-1).

South: Local Business Zone (CB-1) and Multiple Residence (CR-5).

West: County Manufactured and Mobile Home-1 Zone (CMH-1).
East: Local Business Zone (CB-1) and Rural Residential Zone (GR-1).

b) Existing Land Use within ¼ mile

North: Vacant, undeveloped. Tucson Mountain Ranch Cluster Development is approved.
South: Diablo Village Estate Townhouses, Diablo Village Estates, West Star Estates, and Star Valley Village subdivisions.
East: Unregulated development.
West: Tucson Mountain Ranch Subdivision.

c) Existing Structure Heights in Surrounding area

Development in the area is a mixture of single and two-story homes. Typically, most of the older homes in the area are single-story, while a number of the homes in newer subdivisions are two-story.

d) Pending or conditional approved Rezoning, Subdivisions/ Development Plan

Current planning efforts in the area include the Valencia Road improvements and the La Luna subdivision rezoning (Co9-04-25).

e) Comprehensive Plan Designations

The entire site is subject to comprehensive plan amendment Co7-08-10, rezoning policy RP-121 and special area policies S-29, S-35 and SWIP/Retail.

North: Medium Low Intensity Urban (MLIU)
South: Medium Intensity Urban (MIU) & Neighborhood Activity Center (NAC)
East: Medium Intensity Rural (MIR)
West: Medium Low Intensity Urban (MLIU)

Refer to Exhibit I-A-3 Existing Land Uses & Approximate Densities

1) Rezoning Policy-121: Conformance

The Tucson Mountain Ranch Commercial Center is subject to the policies and procedures of RP-121. Project conformance to the policies and procedure is as follows (conformance response in *blue italics*):

Policy A.1:

1. Planning and design of the subject property shall occur in such a manner so as to minimize appearance of traditional "strip" commercial development.

The Preliminary Site Design (PDP) of Tucson Mountain Ranch Commercial Center does not propose a traditional "strip" development pattern. The commercial center is designed around a pedestrian walkway and event center. Anchor tenants and shops are balanced along the western and eastern wings. The design also incorporates four stand-alone pads along Valencia that will incorporate architectural details on all sides.

2. A single, monolithic strip of buildings that is solely oriented toward Valencia Road or Wade Road is prohibited.

The building massing has a central pedestrian-friendly event center and is not a single monolithic strip of buildings.

3. However, building placements along Valencia Road and Wade Road shall comprise no more than 40 percent of each street frontage.

The PDP has four stand-alone pads along Valencia and will not comprise 40% of the street frontage.

Policy A.2:

1. Parking lots shall be landscaped so as to reduce heat - island effect by employing groupings of shade trees that create effective shade clusters and improve the survivability and thriving of the specimens.

The parking lot design provides parking fields in five separate clusters. Landscape plantings, anchored with shade trees, provides shade clusters in the center and along the edges of the parking fields.

2. The total number of trees placed within the parking lot shall be at least 25 percent more than that minimally required by the Zoning Code or provide an alternative site design including such things as extended creative shade structures around buildings, other pedestrian areas, and asphalt, that accomplishes a functionally equivalent reduction in heat island effect.

The minimum tree counts, per the Zoning Code, will be exceeded by 25% or shade structures will be constructed along pedestrian walkways and seating areas to reduce the heat island effect.

Policy A.3:

1. Mixed-use development is encouraged where the size of the parcel warrants it or where the property directly abuts existing residential development.

This application is not proposing a mixed-use commercial/residential development.

2. Complementary lower intensity uses such as offices, daycare centers, and the like shall be encouraged adjacent to residential areas rather than retail.

The CB-1 zoning district allows for service uses. The proposed layout provides areas for non-retail uses that will serve adjacent residential development. The Tucson Mountain Ranch commercial project is located adjacent to the Tucson Mountain Ranch cluster residential project (see Exhibit II-B-1a). The residential project was approved on October 15, 2015 by the DRC and received an extension to October 15, 2019 on March 1, 2017. The cluster residential project proposed 419 lots, recreation and open space. A walking/bicycle trail will connect the residential project to the commercial project on the northern boundary, allowing residents to access the project without traveling in an automobile. Automobile access will be provided along the western, eastern, and southern boundaries.

3. Building heights shall be limited to a maximum of 20 feet within 100 feet of the boundary of existing or platted lots for single family residences, except that the height limit shall not apply within 200 feet of the edge of right-of - way for Valencia Road and Wade Road.

Currently, there are no existing or platted residential lots adjacent to the commercial center. The residential cluster development to the west and north have provided 40' and 25' buffers adjacent to the commercial center. Exhibit II-B-1a shows the relationship between the proposed residential cluster development and the proposed commercial center. Tucson Mountain Ranch Commercial Center is requesting a 50' combined buffer, as the approved Cluster Development incorporated bufferyards in anticipation of the development of commercial land uses.

Policy A.4:

1. The project will have a consistent and uniform architectural design concept for all commercial/retail elements of the site.

The future developer of the commercial center will present architectural concepts during the building permit phase. Presently, commercial developers use uniform architectural design concepts to brand the commercial centers to improve the leasing success. The development of this commercial center will conform to the current trends.

2. All tenants shall modify and upgrade their standard prototypes so as to be consistent in character and quality with the overall architectural design concept of the project.

Acknowledged. The use of uniform architectural design concepts improves the commercial centers branding.

Policy A.5:

1. The existing CB-1 zoning at the corner of the intersection shall be included in the rezoning Preliminary Development Plan and subsequent subdivision plat or development plan.

See Exhibit II-B-1 - Preliminary Development Plan. The existing CB-1 zoning at the corner of the intersection has been integrated into the PDP.

Policy A.6:

The subject property shall be designed so as to employ non - traditional arrangements of the various commercial uses on the property and will ensure that same do not unilaterally “back up” to the north or west property boundaries with minimal or no buffering, as is the case with conventional “strip commercial” developments.

The proposed massing arrangement of the commercial center utilizes the entire 15.3-acre site. To conform to the commercial development standards, the main massing of the center is along the northern portion of the site, anchored by a pedestrian-friendly event space. Between the commercial center and the proposed residential neighborhood there are bufferyards and the service access for the commercial shops. Along the southern portion of the site four stand-alone pads frontage Valencia Road.

Policy A.7:

The design of the subject property shall also provide for direct pedestrian, bicycle, and vehicular connectivity, via a landscaped linkage to the adjacent property so as to facilitate the latter’s future planning, design, and use in an integrated fashion.

The commercial center has a pedestrian/bicycle path that connects to the pathway system in the proposed residential development to the north. Also, two local street alignments are proposed. One to the west and one to the east.

Procedure B.1:

In addition to standard rezoning application requirements (i.e. Site Analysis, Rezoning Impact Statement, etc.), the rezoning application for the property shall also include a detailed architectural and aesthetic concept to include:

a) Architectural elevations for the anchor store, shop space, and free-standing pad concepts;

Included in Architectural and Aesthetic Concepts.

b) Character sketches and perspectives of the project;

Included in Architectural and Aesthetic Concepts.

c) Descriptions of proposed materials;

Included in Architectural and Aesthetic Concepts.

d) Written architectural guidelines and theming requirements;

Included in Commercial Design Manual.

e) Landscape concepts and sketches for buffers, parking fields, and landscape amenity/accent elements;

Included in Architectural and Aesthetic Concepts.

f) Photometric studies and conceptual lighting design to support compliance with Outdoor Lighting Code (OLC).

The photometric studies will be provided during the building permit phase. The Tucson Mountain Ranch Commercial Center will conform to Lighting Area E1c requirements and will include Amber LEDs or max 2700K LED lamps in the final lighting design.

Procedure B.2:

1. In developing the architectural and aesthetic concept described in Item 1 above, the rezoning applicant shall meet with designated neighborhood representatives to review the project site plan,

architectural design, and landscape elements so as to obtain feedback and input from the neighborhood representatives.

A neighborhood meeting was held on December 5, 2017. The meeting proceedings are included in the Appendix C. A second meeting will be held on January 18, 2018 and those proceedings will be provided at the Planning and Zoning Commission hearing in February 2018.

2. While no formal approval rights are conferred to the neighborhood representatives in this regard, the applicant shall work in good faith to solicit and incorporate the neighborhood input and to develop a final design that balances owner/developer needs against neighborhood preferences.

Acknowledged.

3. The rezoning applicant shall conduct and complete these required interactions with the neighborhood representatives prior to submitting the full rezoning application package.

Acknowledged.

4. Within 30 days after a positive action on a rezoning request by the Board of Supervisors, the applicant shall memorialize and record any written agreement with the neighborhood(s) discussed or presented at the public hearing(s).

Acknowledged.

Procedure B.3:

The applicant shall meet with staff at least once prior to submitting the full rezoning application package to ensure compliance with the rezoning policies.

The meeting was completed on November 1, 2017 with Brian Pugh, a representative from the WLB Group, and Pima County Senior Planners Terri Tillman, Mark Holden, and Thomas Drzazgowski.

Procedure B.4:

The rezoning application will include a narrative describing the applicant's neighborhood interactions and the neighborhood issues of particular concern. In addition to architectural design, landscaping, lighting, etc., the narrative shall also address the following project particulars and operational matters:

- 1) Project maximum building square footage.
- 2) Maximum single-tenant size.
- 3) Maximum building height.
- 4) Hours of operation.
- 5) Trash pickup limitations.
- 6) Service delivery limitations.

The PDP was presented to the December 5, 2017 neighborhood meeting and all of the project particulars found above were addressed. A narrative of the interactions is included in Appendix C.

Procedure B.5:

1. The final architectural and aesthetic concept and neighborhood documentation shall be considered a material part of the rezoning application and shall be binding upon the owner/developer as a condition of rezoning approval.

Acknowledged.

2. The project's subsequent formal Development Plan and Building Permit submittals to Pima County shall be reviewed by Development Services Department staff to ensure compliance and consistency with the architectural and aesthetic concepts as included in the rezoning application.

Acknowledged.

Procedure B.6:

Prior to submitting the full rezoning application to Pima County, the applicant shall also:

- 1) Meet with Pima County Chief Building Official to discuss the project's proposed concept lighting design and photometric analysis and to demonstrate conceptual compliance with the Outdoor Lighting Code (OLC); and

2) Meet with representatives of Kitt Peak National Observatory to discuss the same proposed lighting design and to describe the activities which have occurred with the Chief Building Official and the manner in which compliance with the OLC will occur. The applicant's rezoning application package will include a narrative describing the meetings, issues, findings, and results from these interactions with Kitt Peak and the Chief Building Official.

On February 17, 2016, the Tucson Mountain Ranch Commercial Project communicated with the Pima County Chief Building Inspector, Yves Khawam, to discuss the proposed lighting design. The project is in Lighting Area E1c, and the project will use full cutoff fixtures, and LPS fixtures may be used. The project proposed to meet "conceptual compliance" by agreeing to either Option 1 or 2 of the OLC's Table 401.1, plus any reasonable requests by Kitt Peak representatives.

On February 17, 2016, the Pima County Chief Building Inspector responded regarding the project's proposed conceptual lighting design to meet the OLC. Yves Khawam's response is below:

"I think we can consider conceptual compliance achieved per your proposal below as I can't see it doesn't make sense to provide photometry on a conceptual plan. If you select option 2, I would encourage you to use amber LEDs or max 2700K LED lamps."

The specific requirements of the of the Chief Building Inspector's response are acknowledged. As project development continues, the Chief Building Inspector and representatives from Kitt Peak will be contacted and photometry of a conceptual lighting plan will be provided.

Procedure B.7:

1. Board of Supervisors approval of each plan amendment does not preclude the Board from reviewing the land use for each site in the next update of the Comprehensive Plan due to be completed in 2011.

Acknowledged.

2. Further, if the uses as proposed have not fully developed by the kick-off of the following Comprehensive Plan update due to be completed in 2021, the planned land use for the undeveloped or partially developed site shall be reconsidered by the Board for re-planning.

Acknowledged.

2) Special Area Plan 29 Southwest Infrastructure Plan (SWIP) (SW)

The Tucson Mountain Ranch Commercial Center will conform to the policies of the Southwest Infrastructure Plan (SWIP).

3) Special Area Plan 35 – Retail Enhancement Contribution Areas (SW)

The Tucson Mountain Ranch Commercial Center is requesting the Board of Supervisors waive these requirements as it does not pertain to this project. The "Retail Enhancement Contribution Area" reflects the 4 mile radius surrounding the tentatively named "Mountain Vista Shopping Center" (aka Wal-Mart) at Ajo and Kinney as described in the Wal-Mart Development agreement as recorded on Docket 12939 and Page 7309.

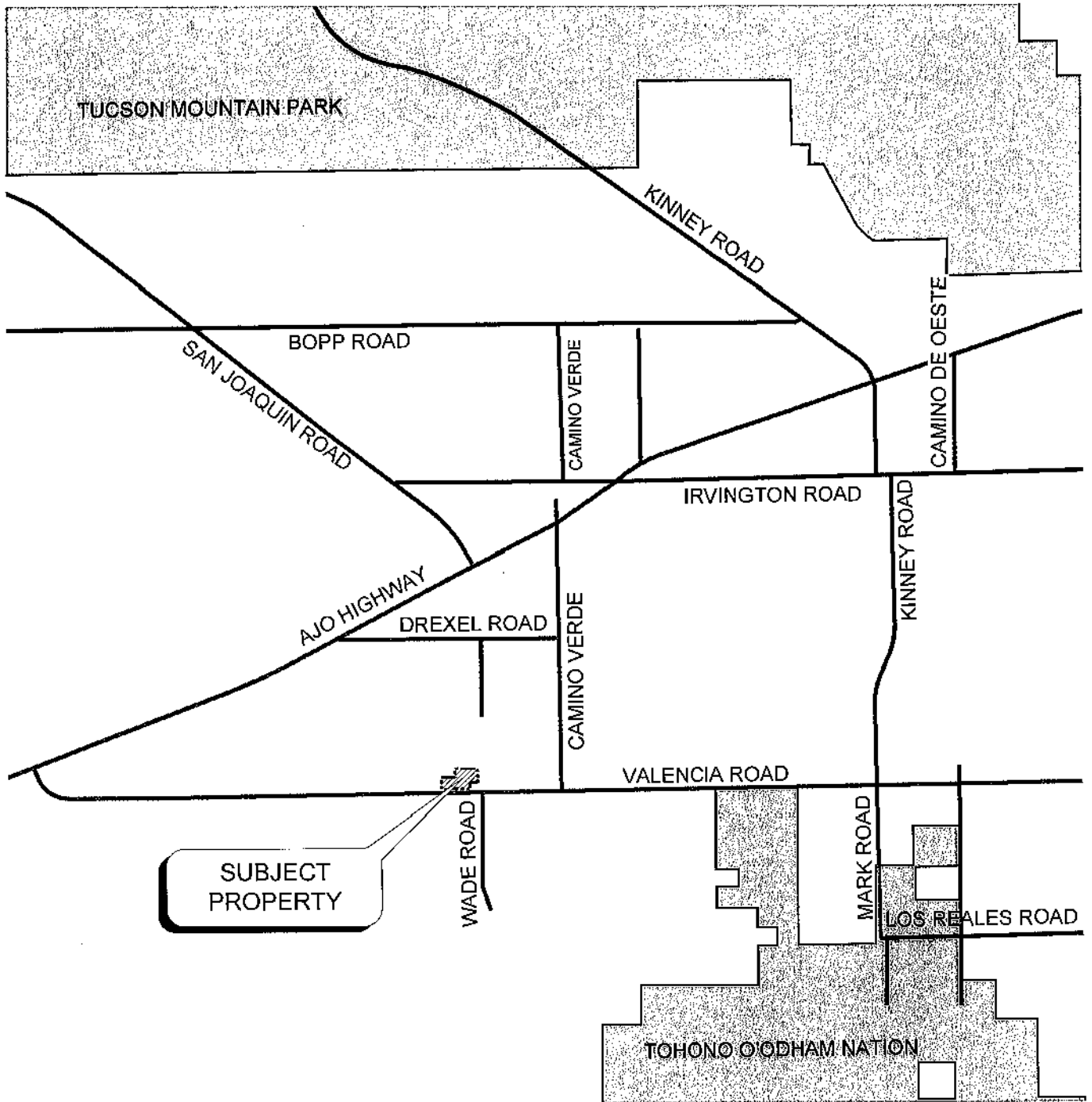
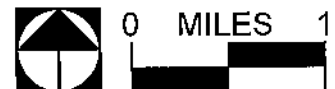


EXHIBIT I-A-1 - REGIONAL LOCATION MAP



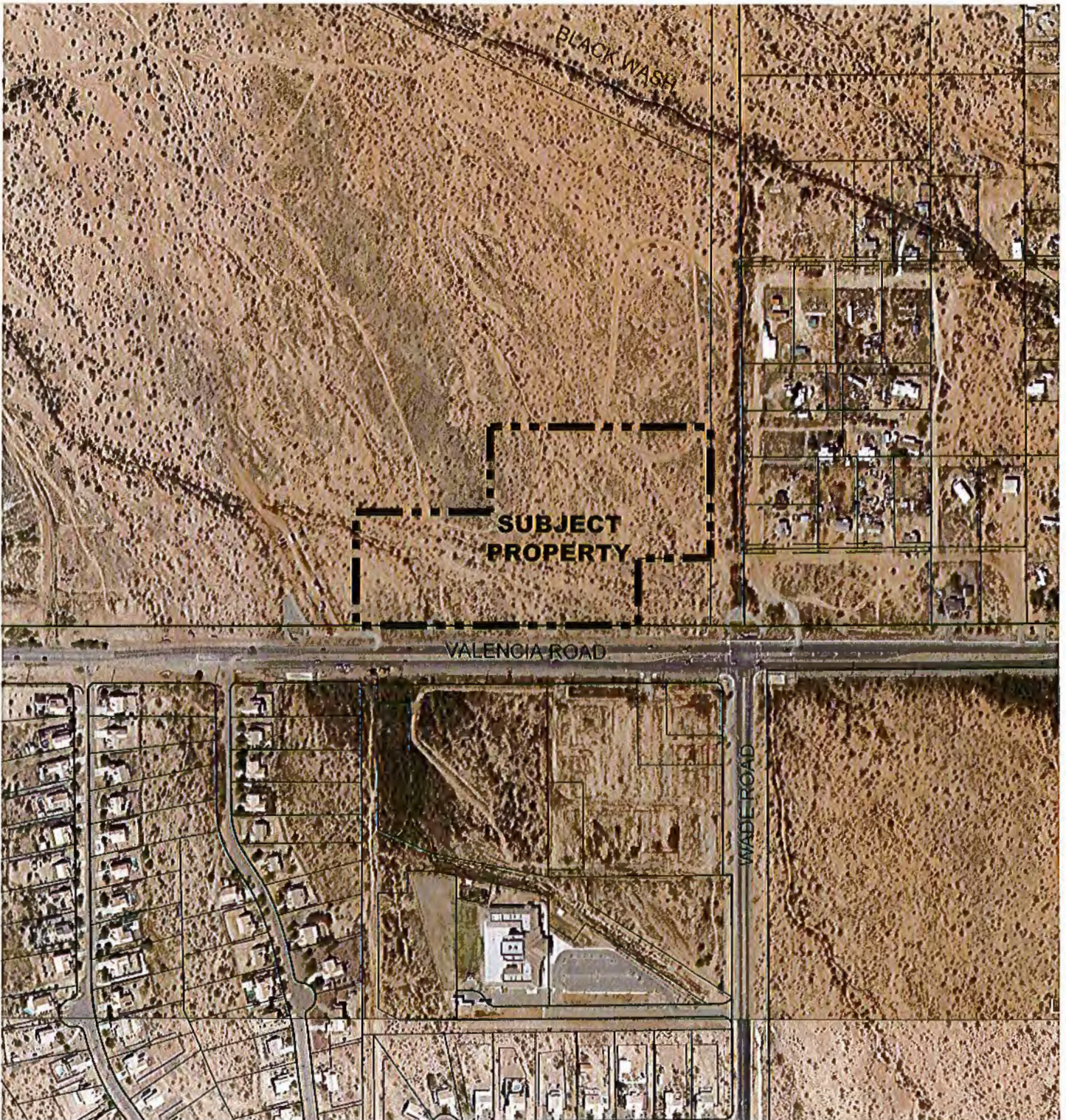


EXHIBIT I-A-2 - AERIAL PHOTOGRAPH

Aerial Photo February 2017



0'

500'



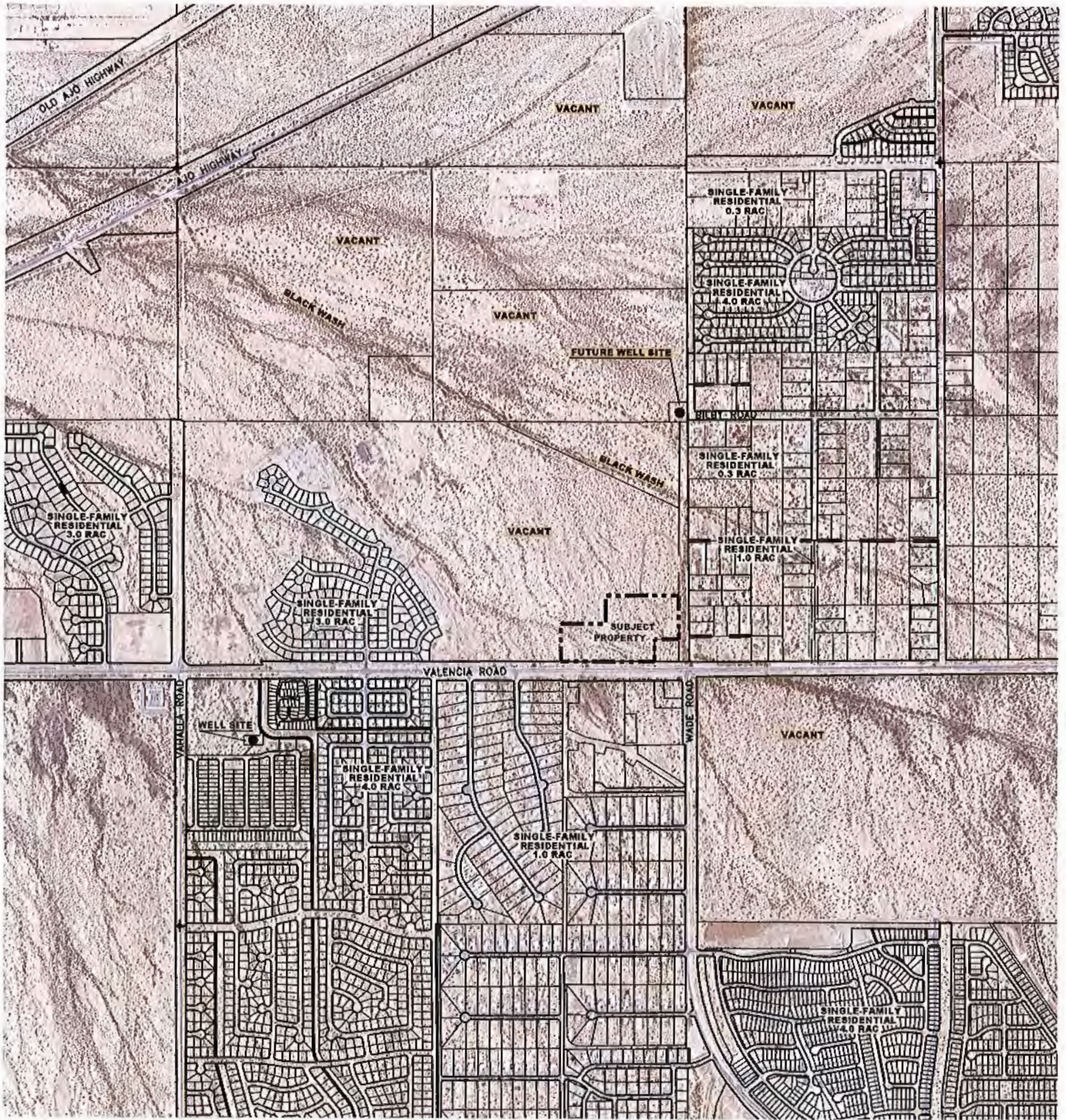
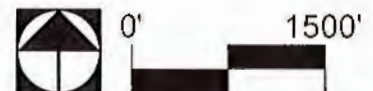


EXHIBIT I-A-3 - EXISTING LAND USES & APPROXIMATE DENSITIES



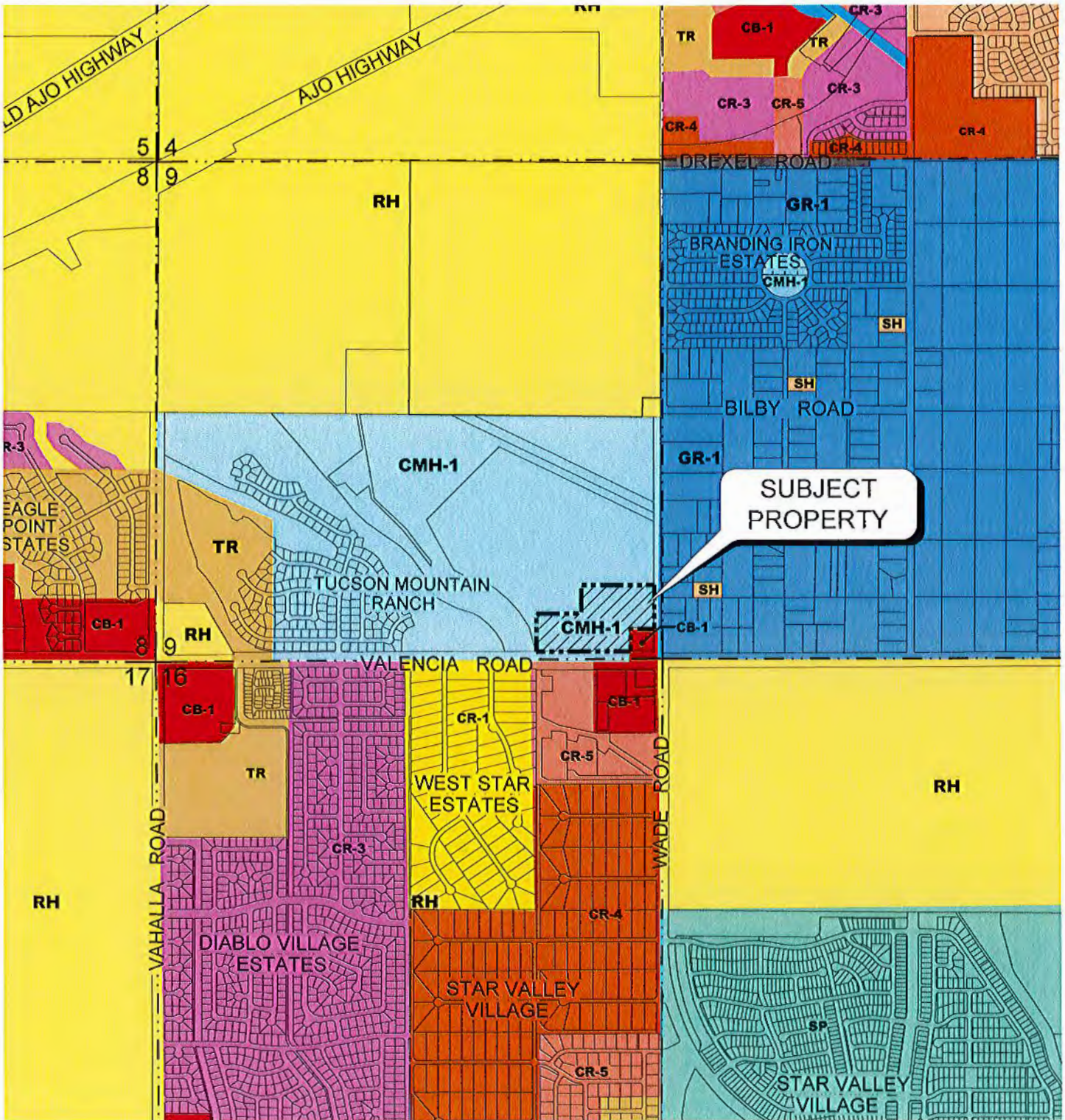
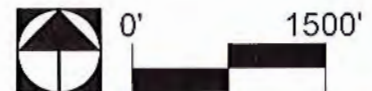


EXHIBIT I-A-4 - EXISTING ZONING



I-B. TOPOGRAPHY & GRADING

1. TOPOGRAPHIC CHARACTERISTICS OF THE SITE

a) Restricted Peaks and Ridges

The subject property is relatively flat. There are no restricted peaks, ridges or other significant topographic features on the site.

b) Rock Outcrops, Talus Slopes

There are no rock out crops, talus slopes or other significant topographic features on the site.

c) Slopes

There are no significant slopes on the site. Elevations onsite range from 2480' to 2485' above sea level.

d) Other Significant Topographic Features

No other significant topographic features exist on site.

e) Existing Grading/Disturbance

The site was previously used for animal grazing resulting in disturbance to the site vegetation.

Refer to Exhibit I-B-1 Topography and Slope Analysis

2. THE PRE-DEVELOPMENT AVERAGE CROSS-SLOPE.

ACS = (cont. interval x cont. length x 0.0023) / acres

Average cross slope was calculated as follows:

$$\frac{(1)(L)(0.0023)}{A} = \frac{(1')(1,200)(0.0023)}{15.3 \text{ ac.}} = \sim 0.18\%$$

ACS = 0.18%

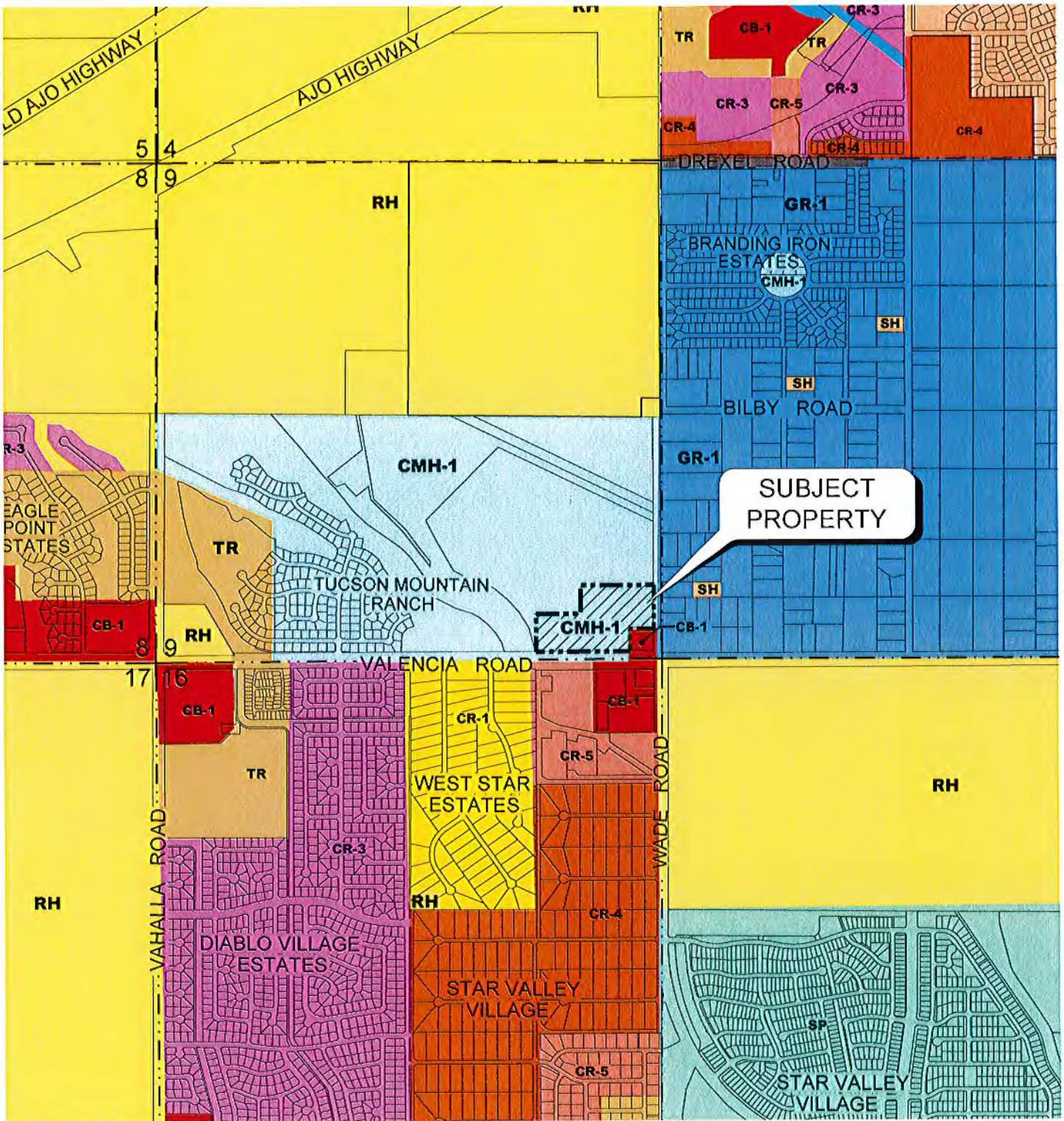


EXHIBIT I-A-4 - EXISTING ZONING



I-C. HYDROLOGY

1. OFF-SITE WATERSHEDS

The perimeter of all offsite watersheds that affect or are affected by the project site both upstream and downstream to their logical conclusion are shown on Exhibit I-C-1 of this site analysis. The project site is located within a critical basin; FPMO Section 16.48.202 states that “drainage basins that have not been previously identified as unsuitable for additional urban development shall be considered as balanced basin but upon study by the chief engineer may be subject to critical basin provisions of this chapter.” There are five offsite watersheds affecting this property. All of these watersheds extend south of Valencia Road. Washes associated with these basins cross Valencia Road in dip sections, except the wash draining to concentration point # 1 (CP#1) where there are several large diameter culverts. These culverts include ten 36-inch diameter CMP’s. These culverts only have capacity to convey about 10% to 20% of the 100-year discharge. The remainder of the flow overtops Valencia Road in a shallow dip section. The largest wash in the vicinity is Black Wash which drains to the north of the site. All tributary washes in the vicinity of the project drain to Black Wash.

2. OFF-SITE FEATURES, NATURAL OR MAN-MADE, WITH ABOVE WATERSHEDS AFFECTED BY, OR AFFECTING THE SITE

There are no significant offsite natural features located within the above-mapped watersheds. The significant man-made features include several drainage channels and detention basins constructed in conjunction with Diablo Village and Star Valley. There are also drainage ditches, along public roads south of Valencia Road that affect drainage patterns. These ditches were constructed to reduce drainage impacts to the roads but their capacity is limited to the 2- to 5-year return period storms. RTA’s Roadway Improvement Plan designates Valencia Road as a “desert parkway”, and is currently under construction for multi-modal transportation improvements. The first phase of the project is from Wade Road to Mark Road, and consists of various drainage improvements.

Significant development within the upstream watersheds is generally limited to the area within one mile of Valencia Road. Land south thereof is on the Tohono O’odham reservation. We understand the Pima County RFCD is studying the feasibility of constructing a regional detention basin in the vicinity of the Diablo Village subdivision, and that the study is in the planning phase. If constructed, the basin would have the effect of reducing peak flow rates at CP#1.

3. ACREAGE OF UPSTREAM OFF-SITE WATERSHEDS

There are two washes adjacent to the project site which have a 100-year discharge greater than 100 cubic feet per second (cfs). The Q_{100} in Wade Road is approximately 274 cfs and Q_{100} of the wash on the western boundary is approximately 381 cfs. The wash along the western boundary drains southeast to northwest through the Cluster Development project. The drainage area of the western wash is approximately 0.5

square miles. The drainage area of the Wade Road wash is approximately five square miles. All washes on the site drain to Black Wash. The total drainage area for Black Wash is approximately 24 square miles.

4. DESCRIPTION OF CHARACTERISTICS OF ONSITE HYDROLOGY

- a. The approximate 100-year floodplains with a discharge greater than 100 cfs are shown on Exhibit I-C-2 of this site analysis. These floodplain areas were derived from the FEMA flood insurance study map.
- b. The entire area of the property is subject to a sheet flooding condition at depths up to 3.0 feet according to the effective flood insurance study map.
- c. The project site is located within a FEMA Zone AO1 and AO2 as depicted on FIRM panel #04019C2265L (June, 16, 2011). A CLOMR will be processed to remove the site from the mapped floodplain.
- d. The 100-year peak discharge rates entering and leaving the site at CP#3 through CP#6 were computed using the Pima County method. These discharge rates were computed by J.E. Fuller Hydrology and Geomorphology on behalf of the Pima County Regional Flood Control District. The 100-year discharges for the washes described above are summarized in Table 1 below.

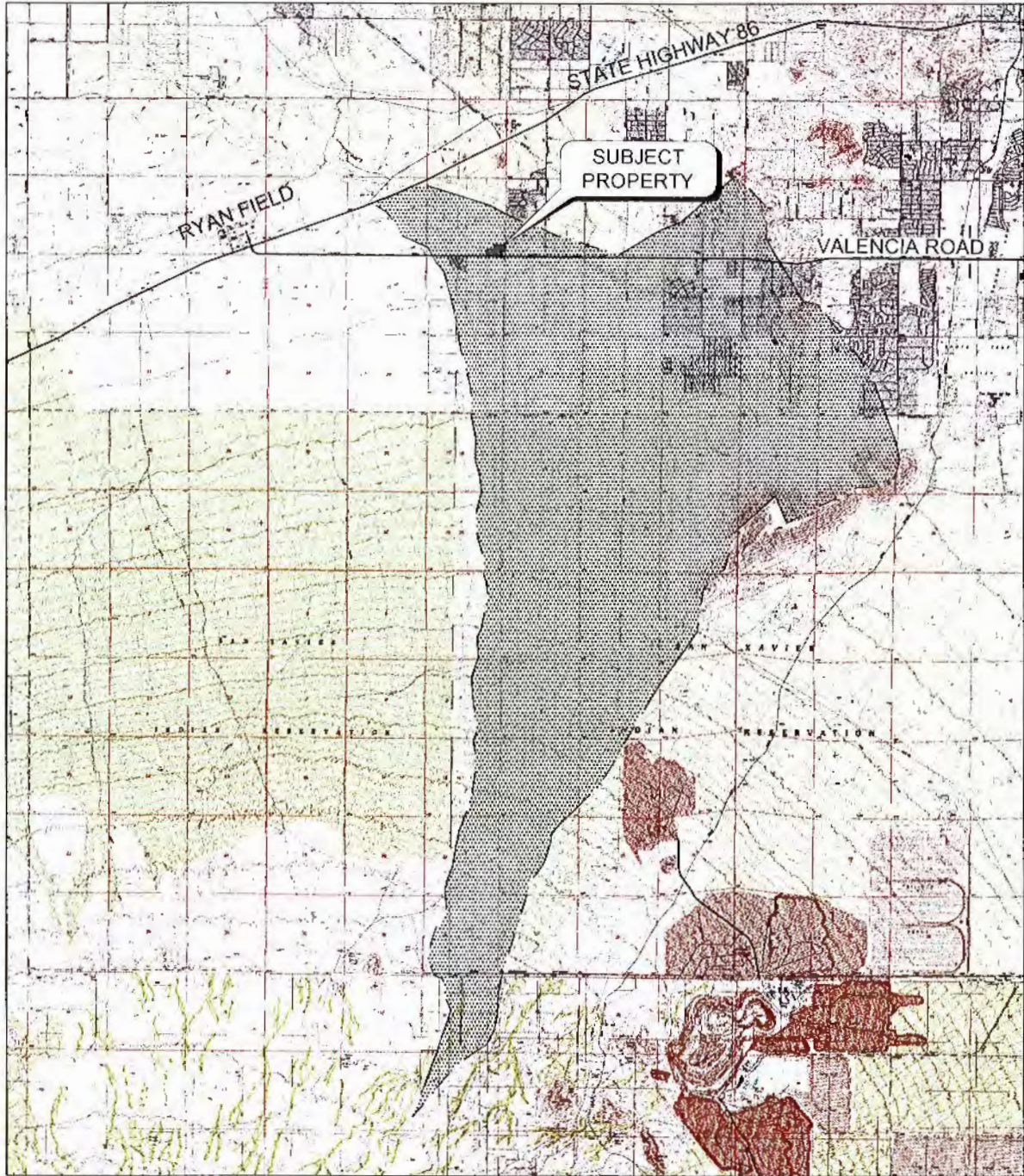
Concentration Point	100-year Discharge (cfs)
3	517
5	312
6 - Black Wash	6703

- e. There are no regulated riparian habitat classifications on the project site. There is an Important Riparian Area located in the Wade Road wash area and to the west of the project.
Refer to Exhibit I-D-1b Protected Species and Riparian Areas.
- f. There are no improvements to the existing drainage courses on the site.
- g. There are no lakes, ponds, wetlands, springs, or other sources of perennial surface water within the project boundaries.
- h. Erosion hazard setbacks will be a minimum of 25' to 75' from watercourses with base flood peak discharges of less than 5,000 cfs or less. Areas located within the erosion hazard areas will have protection as required.

5. DESCRIPTION OF EXISTING DOWNSTREAM DRAINAGE CONDITIONS

The washes crossing this property exit the site along the west and north property boundary. The washes downstream of the project site are natural but sheet flow

conditions and the Black Wash floodplain cover all lands north of the project site. Sheet flow conditions exist throughout the area, and several drainage problems have been reported within the Diablo Village subdivision. The property west of Tucson Mountain Ranch has been developed as a subdivision named Eagle Point Estates. Most of this subdivision has been raised on fill and has been removed from the FEMA floodplain by a Letter of Map Revision.



SOURCE: Brown Mountain, Cat Mountain, Sanmaniego Peak, San Xavier Mission SW, Twin Buttes
USGS 7.5 Minute Topographic Maps

EXHIBIT I-C-1 - OFFSITE WATERSHED



WATERSHED AREA = APPROXIMATELY 24 SQUARE MILES

N.T.S.



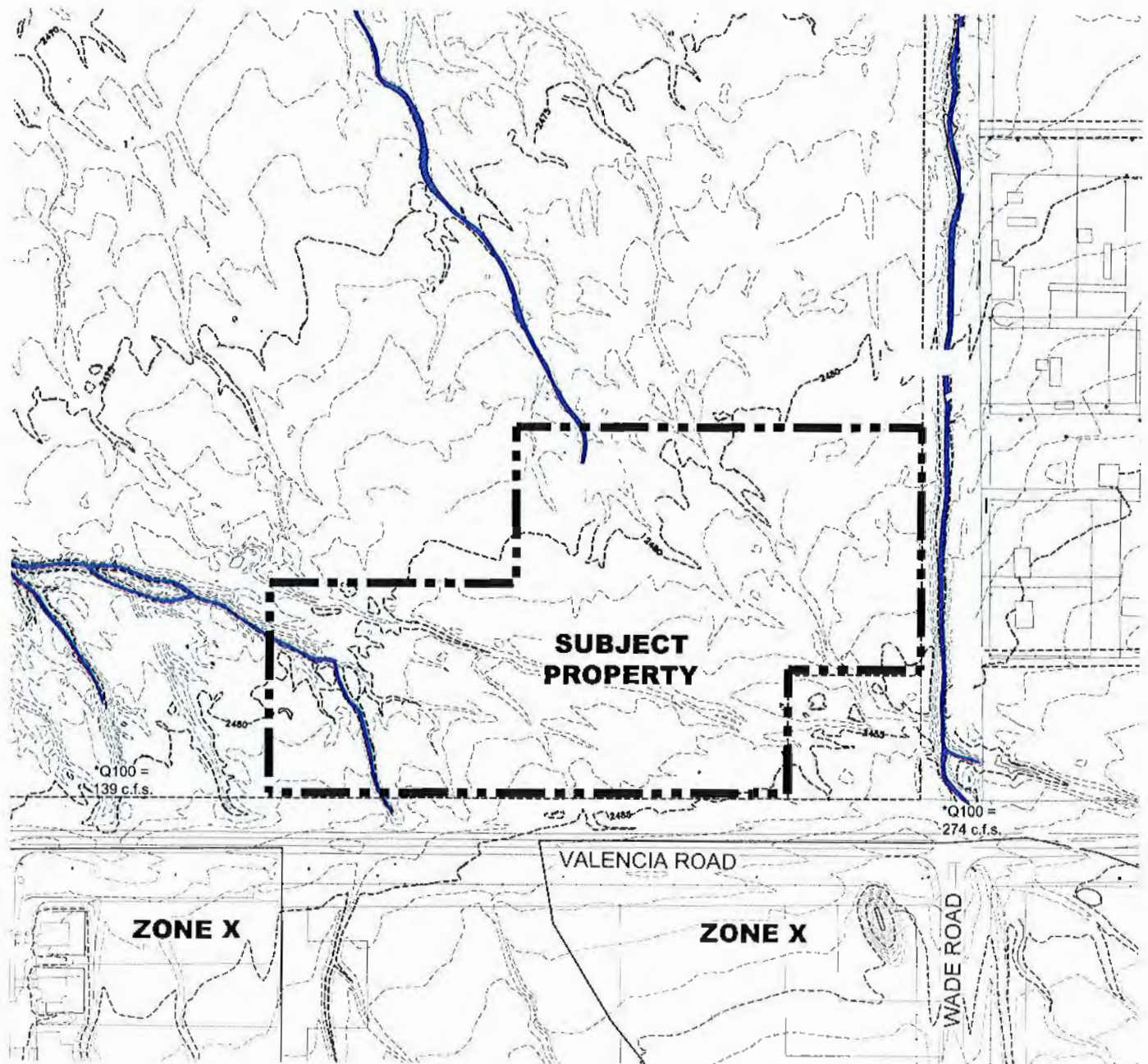



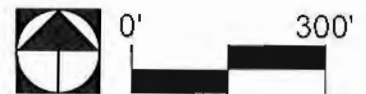


EXHIBIT I-C-2 - ONSITE HYDROLOGY

-  100-YEAR FEMA FLOOD PLAIN
-  PRELIMINARY A.C.O.E. JURISDICTIONAL LIMITS
-  FEMA FLOOD ZONE BOUNDARIES

CONTOUR INTERVAL = 1'

* Q100 FLOWS PER JE FULLER DRAINAGE REPORT



I-D. BIOLOGICAL RESOURCES

1. CONSERVATION LAND SYSTEMS OF THE SITE

There are no CLS designations on the subject property. *Please see Exhibit I-D-2 Protected Species and Riparian Areas.*

2. CRITICAL LANDSCAPE CONNECTIONS WITHIN OR ADJACENT TO THE SITE

The site is cleared of most natural vegetation. Properties to the east, west and south are developed with minimal open space outside of required landscape areas. The Cluster Development proposed to the north will provide natural open space along the washes occurring on that site. The Sonoran Desert Conservation Plan does not identify the site as having critical landscape connections on or adjacent to the site.

3. SONORAN DESERT CONSERVATION PLAN – PIMA PINEAPPLE CACTUS

The Arizona Game & Fish Department identifies this property as being suitable habitat for the Pima Pineapple Cactus, Thornber Fishhook Cactus, and Tumamoc Globeberry. A survey was completed by Carothers Environmental in May of 2006 to determine if any of these 'Special Status Species' exist onsite. Six Pima Pineapple Cacti were identified onsite. In February 2018, The WLB Group resurveyed the area. Of the six previously identified cacti from the 2006 survey, only one was located. Two of the previous cacti locations along Valencia Road were disturbed by the construction of stormwater structures. The other three cacti on the eastern and northern sides of the site were not found. With the construction of the new stormwater structures, stormwater flows into the Wade Road channel. This has impacted the area with drought. Other disturbance was caused by construction equipment and off-road vehicle use. Exhibit I-D-2 Protected Species and Riparian Areas shows the locations of the identified species and the findings from the 2018 survey. All cacti will be relocated and propagated in the open space along the western wash offsite.

4. SONORAN DESERT CONSERVATION PLAN – NEEDLE-SPINED PINEAPPLE CACTUS

The Arizona Game & Fish Department does not identify this property as being suitable habitat for Needle-Spined Pineapple Cactus. A survey was completed by Carothers Environmental in May of 2006 to determine if any of these 'Special Status Species' exist onsite. No Needle-Spined Pineapple Cacti were observed onsite.

5. PRIORITY CONSERVATION AREAS FOR THE CACTUS FERRUGINOUS PYGMY-OWL/ WESTERN BURROWING OWL

The subject property contains several strands of vegetation that have been identified as suitable habitat for the Cactus Ferruginous Pygmy Owl, Burrowing Owl, and California Leaf-Nosed Bat. Although the Pygmy Owl has been removed from the federal Endangered Species List, three complete surveys have been completed for year 2006.

The suitable habitat for the California leaf-nosed bat and the pygmy owl are within the offsite mapped riparian areas. Potential habitat for the Western burrowing owl would exist in open areas with flat terrain. On the subject property, these areas are subject to sheet flows and continual disturbance. Therefore, these areas are not preferential habitat areas for burrowing owl.

The Priority Conservation Areas for the Western burrowing owl are four miles west of the subject property along the Ajo Highway and eight miles east along Valencia Road. The Priority Conservation Area for the California Leaf-Nosed Bat is one mile east of the subject property along Valencia Road. The PCA's were located on the Pima County Map Guide.

6. ARIZONA GAME AND FISH HERITAGE DATA MANAGEMENT SYSTEM

The Arizona Game & Fish Department Environmental Review Tool was consulted and the results are included in Figure 1.

7. ON-SITE INVENTORY OF SAGUAROS AND IRONWOOD TREES

The site was surveyed in May of 2006 by Carothers Environmental and resurveyed by The WLB Group on February 2014. No saguaros or ironwood trees occur onsite.

8. HABITAT PROTECTION / COMMUNITY OPEN SPACE

Per the Sonoran Desert Conservation Plan the project site is not within the habitat protection area and is not considered to be preserved as community open space.

9. VEGETATION AREAS OF IMPORTANT SCENIC VALUE

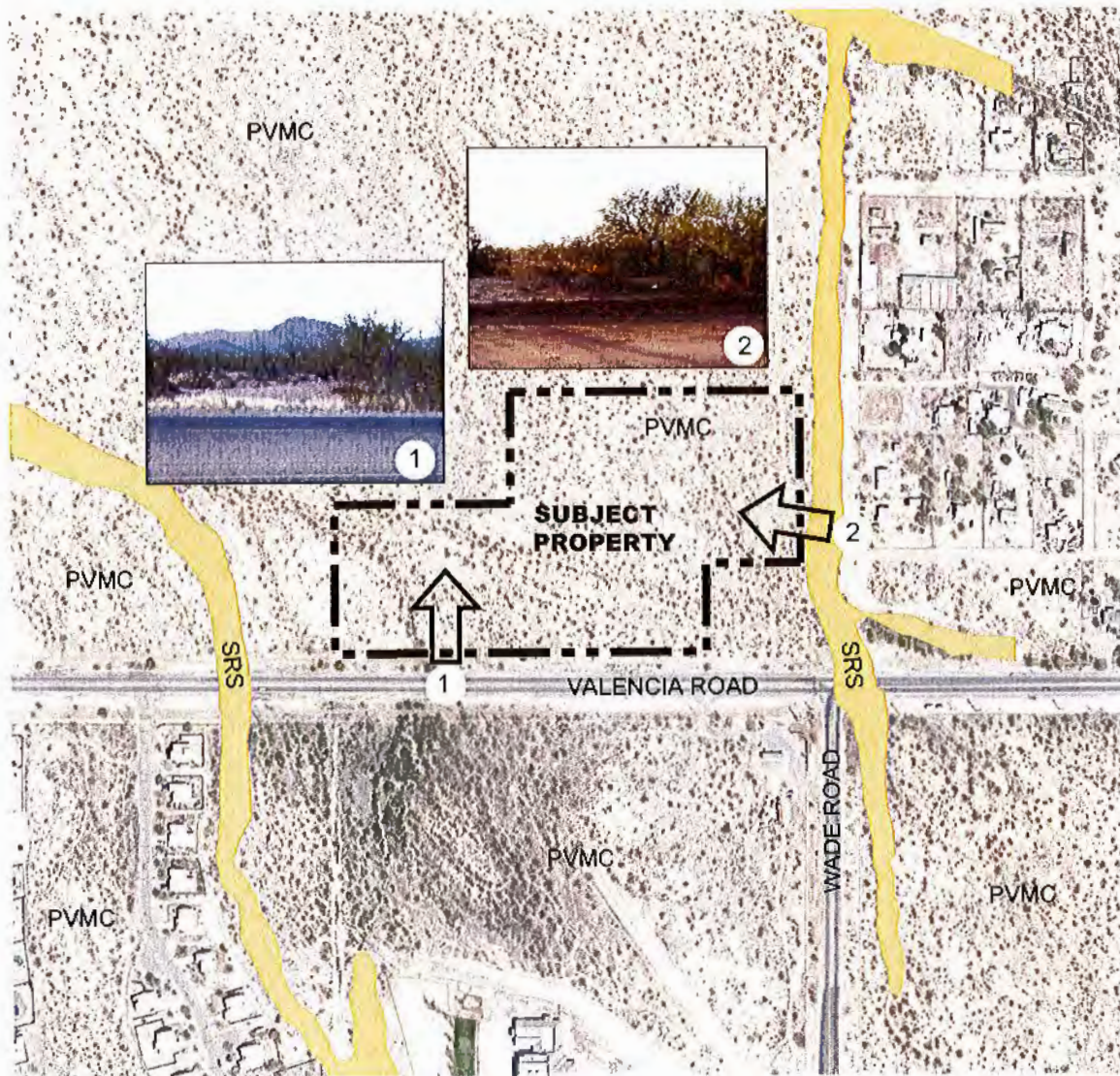
Much of the site has been previously graded, overgrazed, or otherwise denuded of much natural vegetation. The remaining strands of established vegetation and special elements are shown on Exhibit I-D-1.

10. VEGETATIVE COMMUNITIES ON THE SITE

The existing vegetative community of the entire subject property is Palo Verde / Mixed-Cacti. However, the majority of the site has been previously graded, overgrazed, or otherwise denuded. The low-lying areas remaining onsite are identified as Mesquite Series (224.52, Harris) and Sonoran Desert scrub plant communities (154.10, Harris).

As determined by site visits and analysis of aerial photographs, the three existing plant communities, Palo Verde/Mixed Cacti, Mesquite Series, and Sonoran Riparian Scrub are present in Low, Medium vegetative densities. Using a 100' x 100' grid (10,000 square feet), a tree and shrub count was determined and used to calculate the percentage of plant cover. Each massing of vegetation was assigned a value of a Low - 5' radius, Medium - 10' radius, or High - 12.5' radius. Plant cover was then calculated for each 10,000 square foot cell.

Each 100' x 100' cell was assigned a density value of low 0-33%, medium 34-66%, or high 67-100% density. Exhibit I-D-3 shows the location of vegetative densities on the subject property. From this analysis, it is clear that the site is generally very sparsely vegetated.



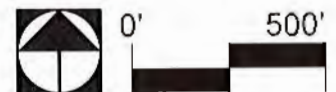
Aerial Photo March 2014

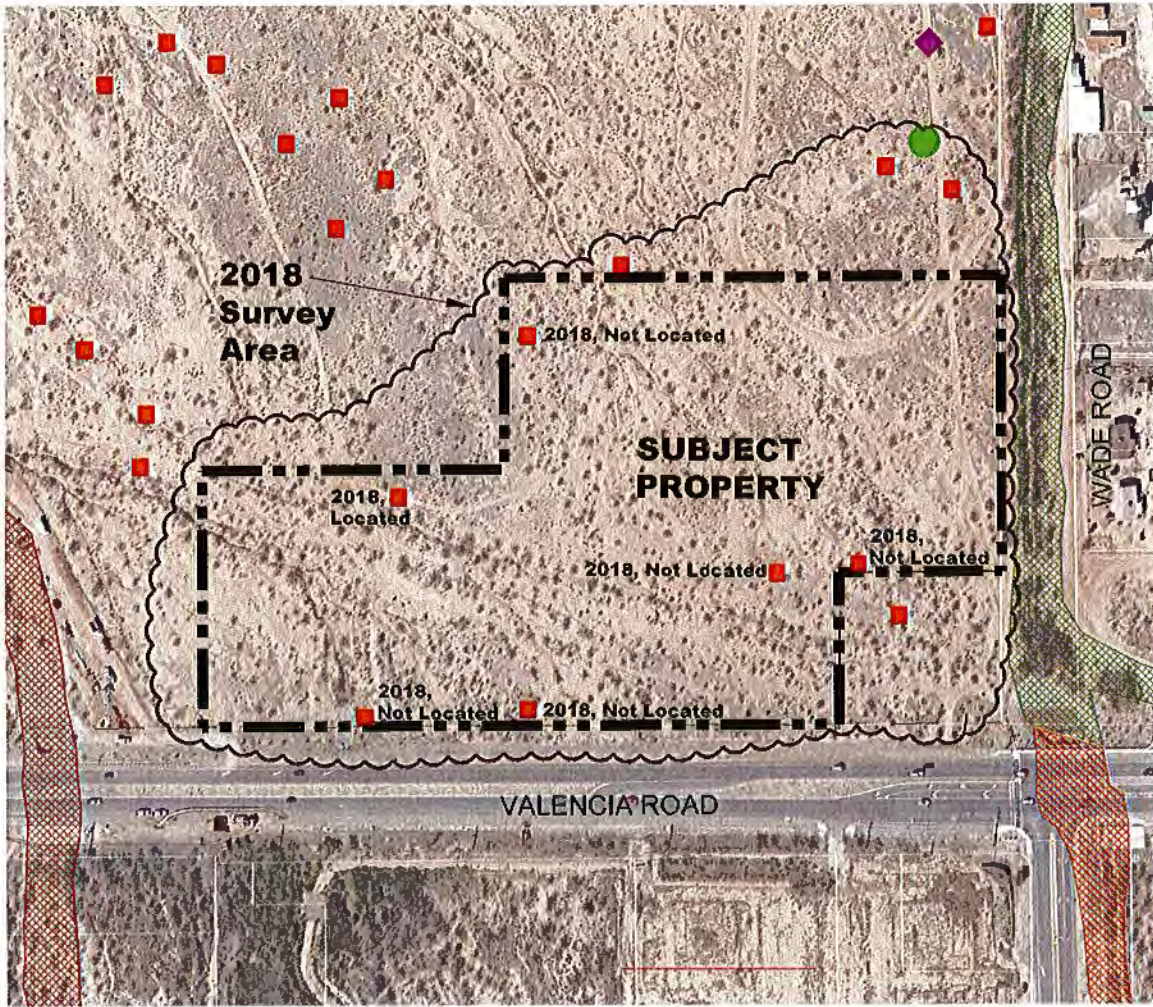
EXHIBIT I-D-1 - VEGETATIVE COMMUNITIES & SPECIAL ELEMENTS

VEGETATIVE COMMUNITIES & SPECIAL ELEMENTS

- SRS SONORAN RIPARIAN SCRUB
- PVMC PALOVERDE/MIXED CACTI

PHOTO LOCATION AND DIRECTION










Aerial Photo: February 2017

EXHIBIT I-D-2 - PROTECTED SPECIES & RIPARIAN AREAS

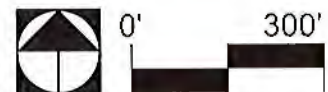
LEGEND

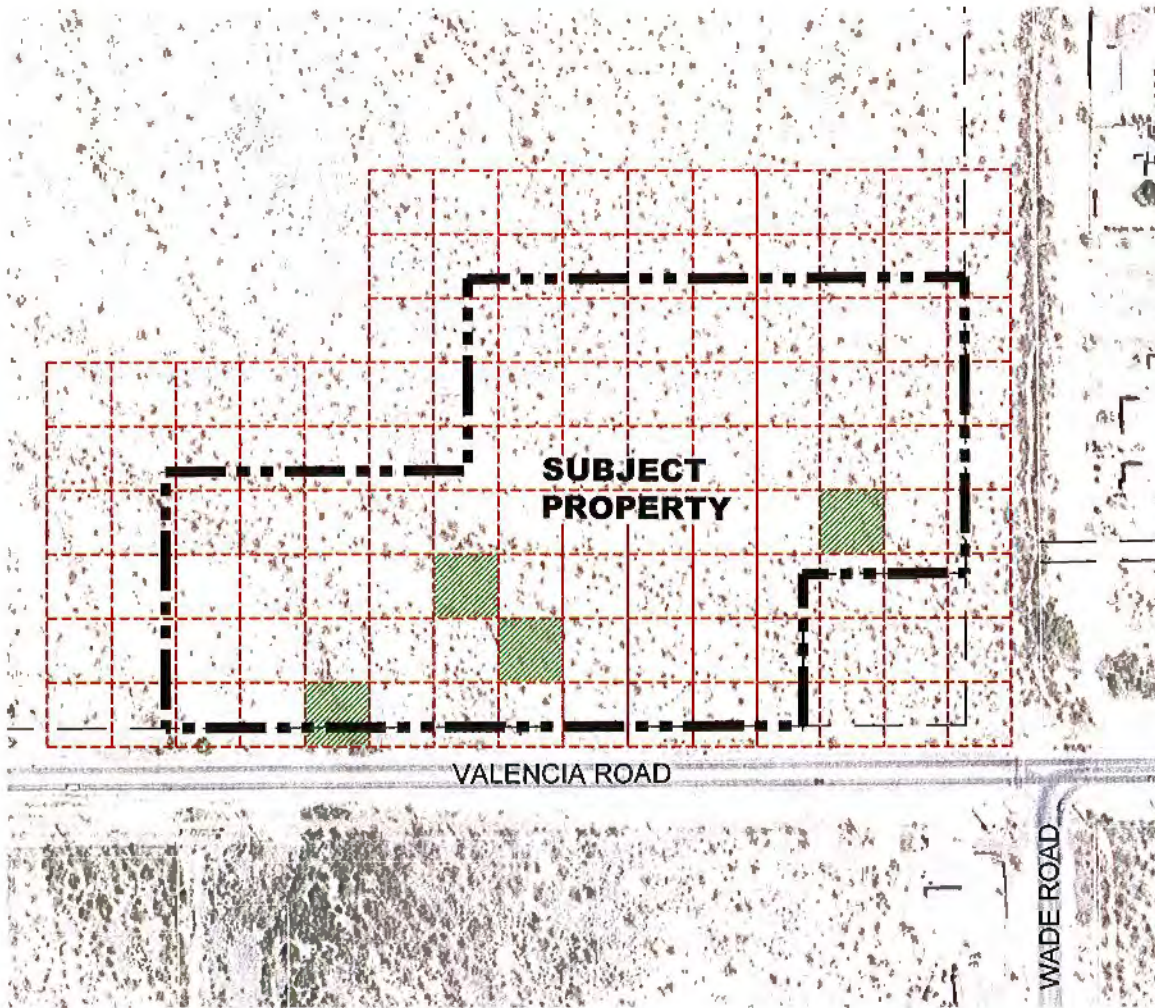
-  IMPORTANT RIPARIAN AREAS
MESQUITE/SONORAN DESERT SCRUB
-  XERORIPARIAN "C"
-  XERORIPARIAN "B"

-  SAGUAROS
-  PIMA PINEAPPLE
- THORNBER CACTUS

NOTE:

THERE ARE NO IRONWOOD TREES ON SITE









Aerial Photo March 2014

EXHIBIT I-D-3 - VEGETATIVE DENSITIES

LEGEND

-  LOW VEGETATIVE DENSITY 0 - 33%
-  MEDIUM VEGETATIVE DENSITY 34 - 66%
-  HIGH VEGETATIVE DENSITY 67 - 100% (NONE)
-  100' x 100' GRID USED FOR DENSITY ANALYSIS

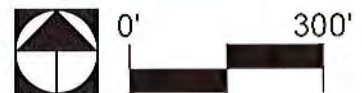


Figure 1: Arizona Game and Fish Department Letter

Arizona Environmental Online Review Tool Report



Arizona Game and Fish Department Mission
To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:

Tucson Mtn. Ranch Commercial

User Project Number:

The WLB Group, Inc.

Project Description:

15.3 Acre Proposed Commercial Project

Project Type:

Development Outside Municipalities (Rural Development), Commercial/Industrial (mall) and associated infrastructure, New construction

Contact Person:

Brian Pugh

Organization:

The WLB Group

On Behalf Of:

PIMA

Project ID:

HGIS-06692

Please review the entire report for project type and/or species recommendations for the location information entered. Please retain a copy for future reference.

Figure 1: Arizona Game and Fish Department Letter (Continued)

Arizona Game and Fish Department
Project ID: HGIS-00692

project_report_tucson_mtn_ranch_comm_25798_28512_FINAL.pdf
Review Date: 1/26/2018 02:24:55 PM

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HabiMap Arizona data, specifically Species of Greatest Conservation Need (SGCN) under our State Wildlife Action Plan (SWAP) and Species of Economic and Recreational Importance (SERI), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:

Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

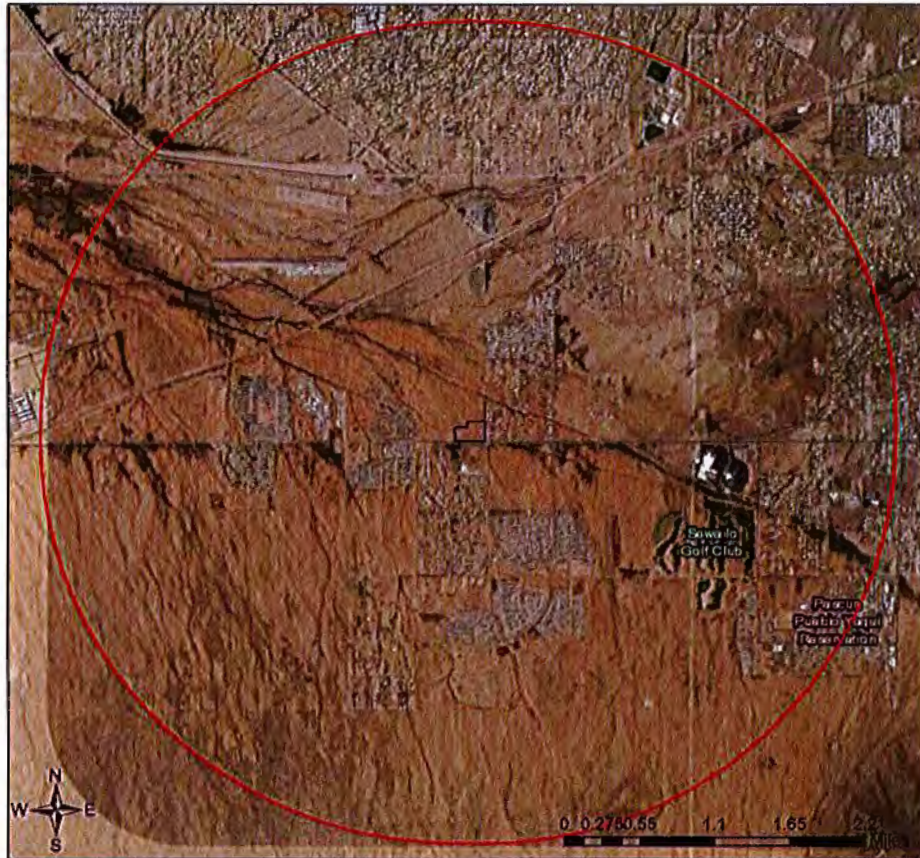
Figure 1: Arizona Game and Fish Department Letter (Continued)

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7800
Fax Number: (623) 236-7386
Or
PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies

Figure 1: Arizona Game and Fish Department Letter (Continued)

Tucson Mtn. Ranch Commercial
 Aerial Image Basemap With Locator Map



- Project Boundary
- Buffered Project Boundary

Project Size (acres): 18.35
 Lat/Long (DD): 32.1344 / -111.1163
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T15S, R12E
 USGS Quad(s): CAT MOUNTAIN

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo,

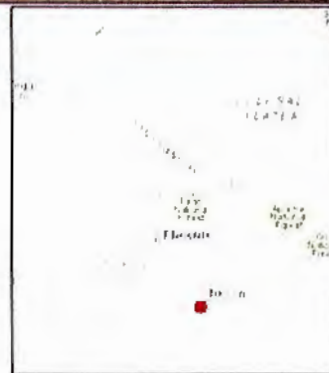
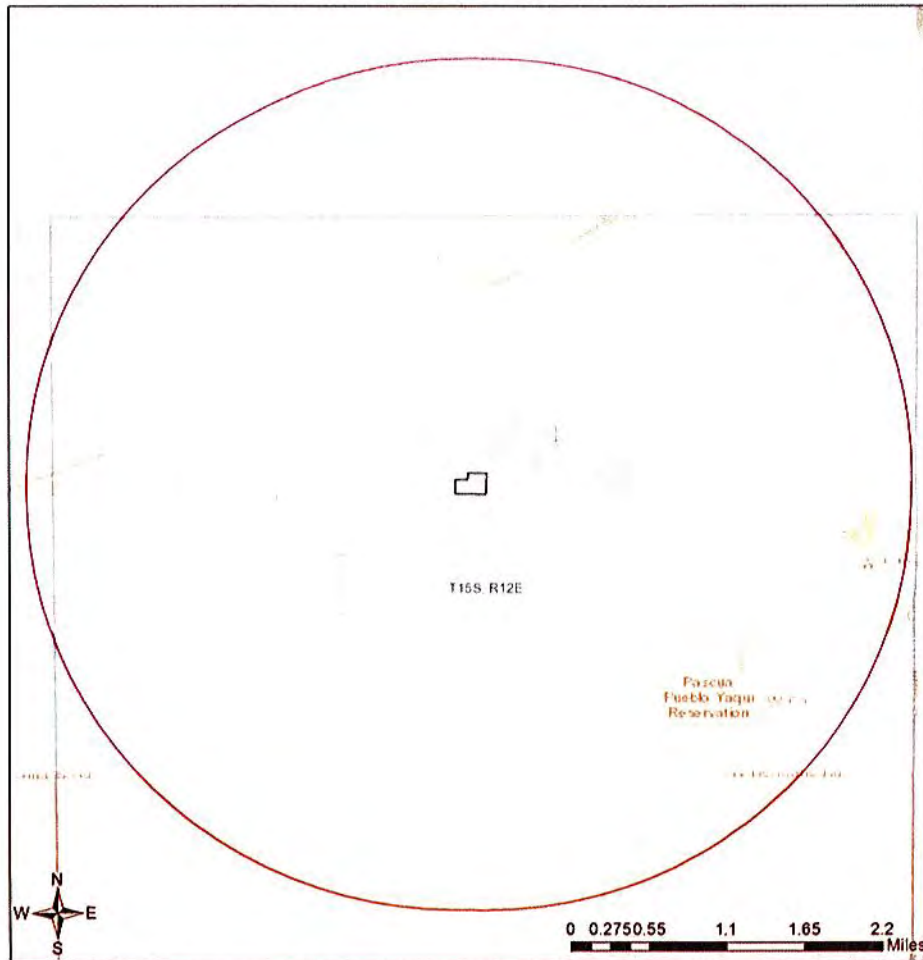


Figure 1: Arizona Game and Fish Department Letter (Continued)

Tucson Mtn. Ranch Commercial
 Topo Basemap With Township/Ranges and Land Ownership



<input type="checkbox"/> Project Boundary	<input type="checkbox"/> Military	Project Size (acres): 18.35
<input type="checkbox"/> Buffered Project Boundary	<input type="checkbox"/> Mixed/Other	Lat/Long (DD): 32.1344 / -111.1163
Township/Ranges	<input type="checkbox"/> National Park/Mon	County(s): Pima
Land Ownership	<input type="checkbox"/> Private	AGFD Region(s): Tucson
AZ Game and Fish Dept	<input type="checkbox"/> State and Regional Parks	Township/Range(s): T15S, R12E
BLM	<input type="checkbox"/> State Trust	USGS Quad(s): CAT MOUNTAIN
BOR	<input type="checkbox"/> US Forest Service	
Indian Res	<input type="checkbox"/> Wildlife Area/Refuge	

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeBCO, IGN, swisstopo, Esri, Swisstopo, GEBCO, Esri, Esri (using Bing), Swisstopo, Mapbox, © OpenStreetMap contributors, and the GIS User Community

Figure 1: Arizona Game and Fish Department Letter (Continued)

Special Status Species and Special Areas Documented within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Aspidoscelis arizonae</i>	Arizona Striped Whiptail			S		1B
Bat Colony						
<i>Coryphantha scheeri</i> var. <i>robustispina</i>	Pima Pineapple Cactus	LE			HS	
<i>Gastrophryne olivacea</i>	Western Narrow-mouthed Toad			S		1C
<i>Gopherus morafkai</i>	Sonoran Desert Tortoise	CCA	S	S		1A
<i>Lithobates chiricahuensis</i>	Chiricahua Leopard Frog	LT				1A
<i>Mammillaria thomberi</i>	Thomber Fishhook Cactus				SR	
Pasqua Yaqui Indian Reservation	Pasqua Yaqui Indian Reservation					
San Xavier Indian Reservation	San Xavier Indian Reservation					
<i>Tumamoca macdougallii</i>	Tumamoc Globeberry		S	S	SR	

Note: Status code definitions can be found at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/>

**Species of Greatest Conservation Need
 Predicted within 3 Miles of Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Aix sponsa</i>	Wood Duck					1B
<i>Ammospermophilus harrisi</i>	Harris' Antelope Squirrel					1B
<i>Anaxyrus retiformis</i>	Sonoran Green Toad			S		1B
<i>Anthus spragueii</i>	Sprague's Pipit	SC				1A
<i>Antrostomus ridgwayi</i>	Buff-collared Nighthawk		S			1B
<i>Aquila chrysaetos</i>	Golden Eagle	BGA		S		1B
<i>Aspidoscelis stictogramma</i>	Giant Spotted Whiptail	SC	S			1B
<i>Aspidoscelis xanthonotia</i>	Red-backed Whiptail	SC	S			1B
<i>Athene cunicularia hypugaea</i>	Western Burrowing Owl	SC	S	S		1B
<i>Botaurus lentiginosus</i>	American Bittern					1B
<i>Buteo regalis</i>	Ferruginous Hawk	SC		S		1B
<i>Calypte costae</i>	Costa's Hummingbird					1C
<i>Chilomeniscus stramineus</i>	Variable Sandenake					1B
<i>Cistothorus palustris</i>	Marsh Wren					1C
<i>Colaptes chrysoides</i>	Gilded Flicker			S		1B
<i>Coluber bilineatus</i>	Sonoran Whipnake					1B
<i>Corynorhinus townsendii pallescens</i>	Pale Townsend's Big-eared Bat	SC	S	S		1B
<i>Crotalus tigris</i>	Tiger Rattlesnake					1B
<i>Crotaphytus nebrius</i>	Sonoran Collared Lizard					1B
<i>Cyananthus latirostris</i>	Broad-billed Hummingbird		S			1B
<i>Dipodomys spectabilis</i>	Banner-tailed Kangaroo Rat			S		1B
<i>Empidonax wrightii</i>	Gray Flycatcher					1C

Figure 1: Arizona Game and Fish Department Letter (Continued)

Arizona Game and Fish Department
Project ID: HGIS-08882

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Species of Greatest Conservation Need Predicted within 3 Miles of Project Vicinity based on Predicted Range Models						
Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Euderma maculatum</i>	Spotted Bat	SC	S	S		1B
<i>Eumops perotis californicus</i>	Greater Western Bonneted Bat	SC		S		1B
<i>Falco peregrinus anatum</i>	American Peregrine Falcon	SC	S	S		1A
<i>Glaucidium brasilianum cactorum</i>	Cactus Ferruginous Pygmy-owl	SC	S	S		1B
<i>Gopherus morafkal</i>	Sonoran Desert Tortoise	CCA	S	S		1A
<i>Haliaeetus leucocephalus</i>	Bald Eagle	SC, BGA	S	S		1A
<i>Heloderma suspectum</i>	Gila Monster					1A
<i>Hypsiglena sp. nov.</i>	Hooded Nightsnake					1B
<i>Incilius alvarius</i>	Sonoran Desert Toad					1B
<i>Laslurus blossevillei</i>	Western Red Bat		S			1B
<i>Lasiurus xanthinus</i>	Western Yellow Bat		S			1B
<i>Leopardus pardalis</i>	Ocelot	LE				1A
<i>Leptonycteris curasoae yerbabuena</i>	Lesser Long-nosed Bat	LE				1A
<i>Lepus alleni</i>	Antelope Jackrabbit					1B
<i>Macrotus californicus</i>	California Leaf-nosed Bat	SC		S		1B
<i>Melanerpes uropygialis</i>	Gila Woodpecker					1B
<i>Melospiza lincolni</i>	Lincoln's Sparrow					1B
<i>Melospiza aberli</i>	Abert's Towhee		S			1B
<i>Micrathene whitneyi</i>	Elf Owl					1C
<i>Micruroides euryxanthus</i>	Sonoran Coralsnake					1B
<i>Myiarchus tyrannulus</i>	Brown-crested Flycatcher					1C
<i>Myotis occultus</i>	Arizona Myotis	SC		S		1B
<i>Myotis velifer</i>	Cave Myotis	SC		S		1B
<i>Myotis yumanensis</i>	Yuma Myotis	SC				1B
<i>Nyctinomops femorosaccus</i>	Pocketed Free-tailed Bat					1B
<i>Oreoscoptes montanus</i>	Sage Thrasher					1C
<i>Oreothlypis luciae</i>	Lucy's Warbler					1C
<i>Panthera onca</i>	Jaguar	LE				1A
<i>Passerulus sandwichensis</i>	Savannah Sparrow					1B
<i>Peucaea carpalis</i>	Rufous-winged Sparrow					1B
<i>Phrynosoma solare</i>	Regal Horned Lizard					1B
<i>Phyllorhynchus browni</i>	Saddled Leaf-nosed Snake					1B
<i>Progne subis hesperia</i>	Desert Purple Martin			S		1B
<i>Setophaga petechia</i>	Yellow Warbler					1B
<i>Sonorella papagorum</i>	Black Mountain Talussnail					1B
<i>Sphyrapicus nuchalis</i>	Red-naped Sapsucker					1C
<i>Spizella breweri</i>	Brewer's Sparrow					1C

Figure 1: Arizona Game and Fish Department Letter (Continued)

**Species of Greatest Conservation Need
Predicted within 3 Miles of Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Stumelia magna</i>	Eastern Meadowlark					1C
<i>Tadarida brasiliensis</i>	Brazilian Free-tailed Bat					1B
<i>Toxostoma lecontei</i>	LeConte's Thrasher			S		1B
<i>Troglodytes pacificus</i>	Pacific Wren					1B
<i>Vireo bellii arizonae</i>	Arizona Bell's Vireo					1B
<i>Vulpes macrotis</i>	Kit Fox	No Status				1B

Species of Economic and Recreation Importance Predicted within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Callipepla gambelli</i>	Gambel's Quail					
<i>Callipepla squamata</i>	Scaled Quail					1C
<i>Odocoileus hemionus</i>	Mule Deer					
<i>Pecari tajacu</i>	Javelina					
<i>Puma concolor</i>	Mountain Lion					
<i>Zenaidura macroura</i>	White-winged Dove					
<i>Zenaidura macroura</i>	Mourning Dove					

Project Type: Development Outside Municipalities (Rural Development), Commercial/Industrial (mall) and associated infrastructure, New construction

Project Type Recommendations:

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife. Guidelines for many of these can be found at: <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

Consider impacts of outdoor lighting on wildlife and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use. Use only the minimum amount of light needed for safety. Narrow spectrum bulbs should be used as often as possible to lower the range of species affected by lighting. All lighting should be shielded, canted, or cut to ensure that light reaches only areas needing illumination.

Figure 1: Arizona Game and Fish Department Letter (Continued)

Arizona Game and Fish Department
Project ID: HGIS-08692

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Minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g., microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g., livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before leaving the site. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants, <https://agriculture.az.gov/>. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control, <http://www.usda.gov/wps/portal/usdahome>. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information <https://www.azgfd.com/hunting/regulations>.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (include spawning seasons), and to reduce spread of exotic invasive species. We recommend early direct coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

Based on the project type entered, coordination with State Historic Preservation Office may be required (<http://azstateparks.com/SHPO/index.html>).

Trenches should be covered or back-filled as soon as possible. Incorporate escape ramps in ditches or fencing along the perimeter to deter small mammals and herpetofauna (snakes, lizards, tortoise) from entering ditches.

Communities can actively support the sustainability and mobility of wildlife by incorporating wildlife planning into their regional/comprehensive plans, their regional transportation plans, and their open space/conservation land system programs. An effective approach to wildlife planning begins with the identification of the wildlife resources in need of protection, an assessment of important habitat blocks and connective corridors, and the incorporation of these critical wildlife components into the community plans and programs. Community planners should identify open spaces and habitat blocks that can be maintained in their area, and the necessary connections between those blocks to be preserved or protected. Community planners should also work with State and local transportation planning entities, and planners from other communities, to foster coordination and cooperation in developing compatible development plans to ensure wildlife habitat connectivity. The Department's guidelines for incorporating wildlife considerations into community planning and developments can be found on the Wildlife Friendly Guidelines portion of the Wildlife Planning page at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

Based on the project type entered, coordination with Arizona Department of Environmental Quality may be required (<http://www.azdeq.gov/>).

Based on the project type entered, coordination with Arizona Department of Water Resources may be required (<http://www.azwater.gov/azdwr/default.aspx>).

Based on the project type entered, coordination with U.S. Army Corps of Engineers may be required (<http://www.usace.army.mil/>).

Based on the project type entered, coordination with County Flood Control district(s) may be required.

Figure 1: Arizona Game and Fish Department Letter (Continued)

Arizona Game and Fish Department
Project ID: HGIS-06692

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Development plans should provide for open natural space for wildlife movement, while also minimizing the potential for wildlife-human interactions through design features. Please contact Project Evaluation Program for more information on living with urban wildlife at PEP@azgfd.gov or at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/> and <https://www.azgfd.com/Wildlife/LivingWith>.

The Department requests further coordination to provide project/species specific recommendations. please contact Project Evaluation Program directly, PEP@azgfd.gov

Project Location and/or Species Recommendations:

HDMS records indicate that one or more native plants listed on the Arizona Native Plant Law and Antiquities Act have been documented within the vicinity of your project area. Please contact:

Arizona Department of Agriculture
1088 W Adams St.
Phoenix, AZ 85007
Phone: 602.642.4373
<https://agriculture.az.gov/environmental-services/np1>

HDMS records indicate that one or more listed, proposed, or candidate species or Critical Habitat (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at <http://www.fws.gov/southwest/as/arizona/> or:

Phoenix Main Office
2321 W. Royal Palm Rd, Suite 103
Phoenix, AZ 85021
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office
201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-8155

Flagstaff Sub-Office
SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-658-2157
Fax: 928-558-2121

HDMS records indicate that Sonoran Desert Tortoise have been documented within the vicinity of your project area. Please review the Tortoise Handling Guidelines found at: <https://www.azgfd.com/wildlife/nongamemanagement/tortoise/>

HDMS records indicate that Chiricahua Leopard Frogs have been documented within the vicinity of your project area. Please review the Chiricahua Leopard Frog Management Guidelines found at: <https://www.azgfd.com/Portals/images/files/wildlife/planningForWildlifeFriendlyGuidelines/FINALLitChirHabitatGdlns.pdf>

Tribal Lands are within the vicinity of your project area and may require further coordination. Please contact:

Pascua Yaqui Tribe
7474 S Camino de Oeste
Tucson, AZ 85748
(520) 883-5000 ext. 5016
(520) 883-5014 (fax)

Tribal Lands are within the vicinity of your project area and may require further coordination. Please contact:

Tohono O'odham Nation
PO Box 837
Sells, AZ 85634
(520) 363-2028
(520) 363-3379 (fax)

I-E. VIEWSHEDS

1. VIEWS ONTO AND ACROSS THE SITE

Due to its location near the middle of the Black Wash, the subject property lies generally lower than Valencia Road and thus is fairly visible from surrounding area. However, required buffer yards and its lower elevation will minimize impacts. Below is a photo of the view across the site.

Refer to Exhibit I-E-1 Viewshed Analysis



Figure 3a: View North from Valencia Road Across Site.

2. SITE VISIBILITY FROM NEARBY LOCATIONS

The subject property is visible from most offsite locations. Increased site visibility is due to the slightly lower elevation of the site than that of Valencia Road, as well as the sparse vegetation typical of the area.

Refer to Exhibit I-E-2 Offsite Viewshed Analysis

The significant views in the local area are the Tucson Mountains located five miles to the northeast and Black Mountain located five miles to the southeast. The building height for CB-1 zoning is 39-feet. Building setbacks from Valencia and Wade Roads are 25-feet. No setbacks are required on the side. The elevation of the site and the setbacks will help lessen the visibility from nearby locations.

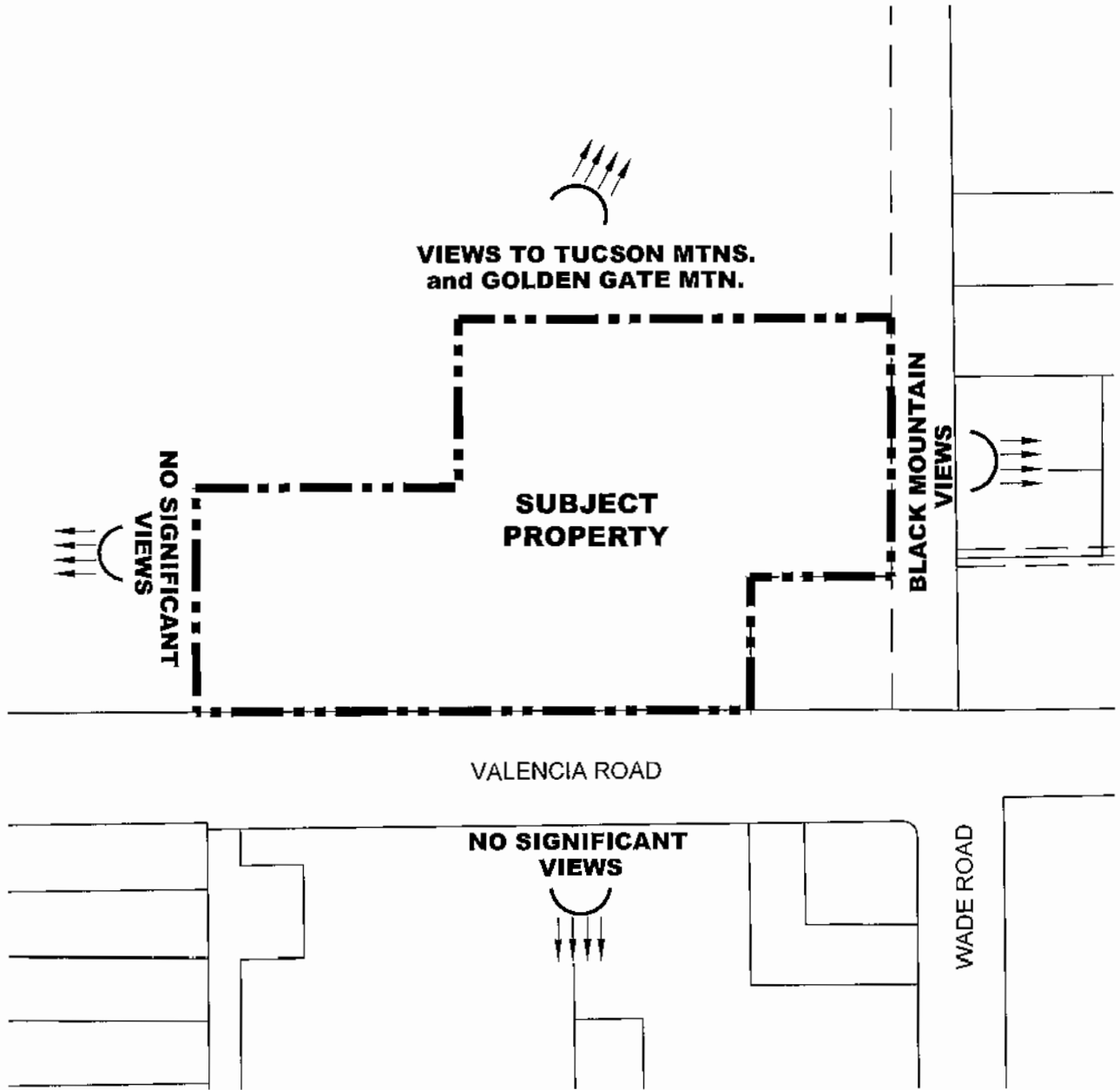
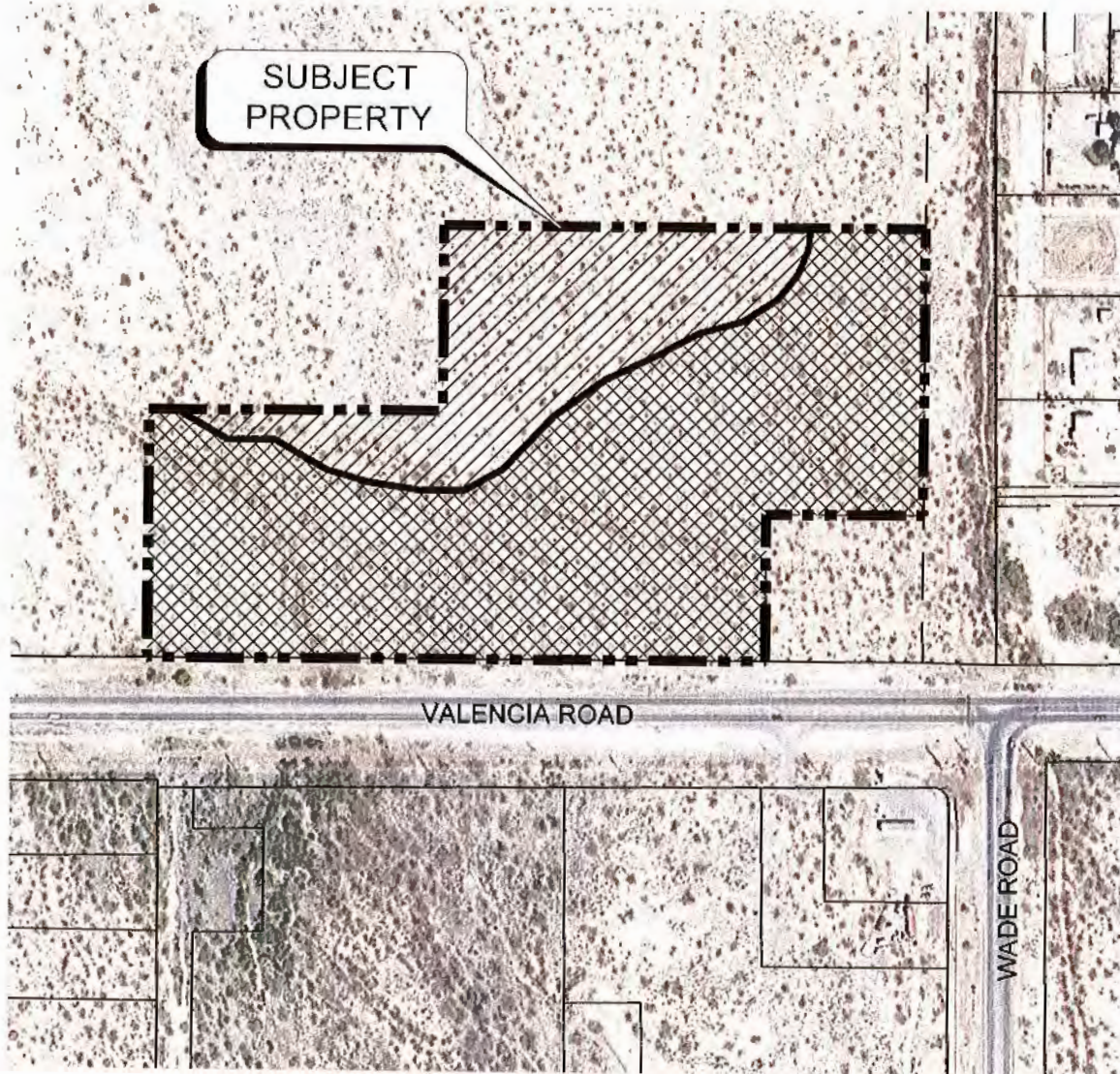


EXHIBIT I-E-1 - ONSITE VIEWSHED ANALYSIS








Aerial Photo March 2014

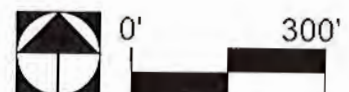
EXHIBIT I-E-2 - OFFSITE VIEWSHED ANALYSIS

SITE VISIBILITY

-  HIGH
-  MODERATE
-  LOW

NOTE

ALTHOUGH AREAS IN THE NORTHERN PORTION OF THE SITE ARE QUITE VISIBLE FROM DIRECTLY ADJACENT LANDS, THESE AREAS ARE GENERALLY NOT VISIBLE FROM ROADWAYS



I-F. TRANSPORTATION

1. ACCESS AND OFF-SITE STREETS

a) Existing Right-of-Way

The project will use Valencia Road to the South and Wade Road to the east. Valencia and Wade Roads are designated as Scenic Major Routes. Right-of-way for Valencia is 200' and Wade Road is 90'. These roads were dedicated by the existing Tucson Mountain Ranch block plat.

b) Pima County Right-of-Way Standards

Valencia Road meets the right-of-way standards with a 200' right-of-way. Wade Road does not meet the minimum county standards. Valencia Road improvements are underway, but none are slated for Wade Road.

c) Right-of-Way Continuity

The streets abutting this project were dedicated additional right-of-way as part of the Tucson Mountain Ranch block plat. Wade Road, however, is currently discontinuous north of Valencia. A drainage channel exists within the Wade Road right-of-way adjacent to the site.

d) Right-of-Way Off Site Roads

Wade Road will need to be constructed approximately ¼ mile north of Valencia Road to accommodate this rezoning and the cluster development being proposed just north of this site.

e) Travel Lanes, Capacity, Posted Speed Limits

Wade Road has two travel lanes and Valencia Road has four travel lanes. Posted speed limit on Valencia is 50 mph and 35 mph on Wade. See section h below for the improvement schedule.

f) Present ADTs

Road	Section	ADT (PAG & PC DOT)*
Valencia Road	Ajo Way to Camino Verde	8,871
	Camino Verde to Mark Road	16,170
Wade Road	South of Valencia	7,503

*Data is from 2017

g) Existing Bike/Pedestrian Ways

There are bike lanes on each side of Wade Road south of Valencia Road. Bike lanes and sidewalks will be included in the roadway widening of Valencia Road. There is a bike lane on each side of Camino Verde south of Valencia Road. There is a shared use path on the west side of Camino Verde south of Valencia Road

h) Improvement Schedule

Valencia Road was recently improved to a four-lane divided desert parkway between Mark Road and just west of Wade Road. The recent improvements included widening the road from two to four lanes, providing a raised median island, bike lanes, sidewalks, drainage improvements, landscaping and intersection improvements. It was completed in 2016.

The project is one of three Valencia Road widening projects currently planned. The next project will be from Wade Road to Mountain Eagle. The third project will be from Mountain Eagle to Ajo Way. These projects are all RTA funded projects.

In March 2015, Camino Verde was extended from Valencia Road south to Brightwater Way/ Valley Stream Drive in the Star Valley Development.

2. DISTANCES TO EXISTING DRIVEWAYS & INTERSECTIONS

From the western edge of the property line to the west along Valencia:

- Star Diamond Place – 470 feet
- Star Ridge Place – 970 feet
- S. Victor Drive – 1340 feet
- Iberia Avenue – 2070 feet

From the eastern edge of the property line to the east along Valencia:

- Wade Road – 375 feet

See Exhibit I-F-2 Distances to existing Drives/Intersections

3. PUBLIC TRANSIT

SunTran Route 29 (Valencia) is the closest route to the project. Its western terminus is at the Casino del Sol Park and Ride lot approximately 1.75 miles east of the subject property. The nearest bus stops are located on Exhibit I-F-3.

See Exhibit I-F-3 Public Transit