



## Coalition for Sonoran Desert Protection

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April 27, 2018

Arizona Center for Law in  
the Public Interest  
Arizona Native Plant  
Society  
Bat Conservation  
International  
Cascabel Conservation  
Association  
Center for Biological  
Diversity  
Center for Environmental  
Ethics  
Defenders of Wildlife  
Desert Watch  
Environmental Law  
Society  
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Friends of Ironwood Forest  
Friends of Madera Canyon  
Friends of Saguaro  
National Park  
Friends of Tortolita  
Gates Pass Area  
Neighborhood  
Association  
Genius Loci Foundation  
Native Seeds / SEARCH  
Protect Land and  
Neighborhoods  
Safford Peak Watershed  
Education Team  
Save the Scenic Santa Ritas  
Sierra Club – Grand  
Canyon Chapter  
Sierra Club – Rincon Group  
Sky Island Alliance  
Society for Ecological  
Restoration  
Southwestern Biological  
Institute  
Tortolita Homeowners  
Association  
Tucson Audubon Society  
Tucson Herpetological  
Society  
Tucson Mountains  
Association  
Wildlands Network

Chair Richard Elías and Supervisors  
Pima County Board of Supervisors  
130 W. Congress St., 1<sup>st</sup> Floor  
Tucson, AZ 85701

### **RE: P18RZ00001 Wong Family LP – N. Thornydale Rd. Plan Amendment**

Dear Chair Elías and Supervisors,

Thank you for the opportunity to provide comments on the proposed N. Thornydale Rd. Rezoning (P18RZ00001 Wong Family Limited Partnership).

This 18.3-acre parcel contains multiple Conservation Lands System (CLS) categories under the Comprehensive Land Use Plan. These include Important Riparian Area (IRA) and an underlying Multiple Use Management Area with a Special Species Management Area (SSMA) overlay.

The CLS categories present on the property have associated open space guidelines: at least 95% open space in IRA and 80% open space in SSMA. CLS guidelines call for on-site conservation and/or off-site mitigation if development commences.

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 off-site mitigation are conditions for approval and if staff is directed to work with CSDP in identifying and approving off-site mitigation parcel(s).** These guidelines have been implemented by Pima County on other projects and are included in the Environment Element of *Pima Prospers*. The guidelines provide direction on how to appropriately select off-site mitigation lands. The staff recommends this in Condition 5A on pages 9-10 of the staff report, and we fully support the condition.

**The Coalition supports the staff-recommended Standard and Special Conditions, and in particular Conditions 5A-B.** 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