



Coalition for Sonoran Desert Protection

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October 20, 2014

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: Co7-14-01 PRF 3, LLC – W. Freer Drive Plan Amendment

Dear Supervisor Miller and Board Members:

Thank you for the opportunity to provide comments on the proposed W. Freer Drive Comprehensive Plan Amendment (Co7-14-01 PRF 3, LLC – W. Freer Drive Plan Amendment).

This 9.79-acre parcel is designated as *Highest Priority Private Habitat Protection Priority* in the Conservation Bond Program, which qualifies it for acquisition and is intended to “guide implementation of the county’s Multi-Species Habitat Conservation Plan.” The Bond Implementation Ordinance states,

The objective of developing the Habitat Protection Priorities was to apply a set of biologically based goals and criteria to the Conservation Lands System to: 1) identify the most important lands to protect first; 2) provide recommendations on the sequencing of land preservation efforts; and 3) design a project so that it can be easily incorporated into an adaptive management program to be implemented over the life of the Federal Section 10 Permit using the best scientific information available.

In other words, this is an important parcel and needs to either be protected on-site or the habitat lost needs to be suitably mitigated for by protecting other, biologically-important land.

This parcel contains multiple Conservation Lands System (CLS) categories under the Comprehensive Land Use Plan. These include Important Riparian Area (IRA), an underlying Multiple Use Management Area with a Special Species Management Area (SSMA) overlay, with the entire property falling within SSMA.

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. 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 off-site mitigation are conditions for approval and are included 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