



April 3, 2013

**Pima County Development Services
Planning Division**

Attn: Daniel Signor
201 N Stone Ave, 2nd Floor
Tucson AZ, 85701

RE: Rezoning Site Analysis Review
Aerie at River Road and Sabino Canyon Road (WEST)
Completeness Review – Comment Response

To whom it may concern,

Thank you for your coordination of the review for the above referenced project. As requested, the following items have been included with this resubmittal package:

- Twenty (20) copies of the Final Site Analysis titled "Planning and Zoning Commission Draft Copy"
- Two (2) CDs or DVDs of same Analysis
- Twenty (20) copies of the Response Memo
- Three (3) copies of a 24" by 36" PDP

We hope that our written response to the comments provided is adequate to address any questions or confirm the requested revisions to the analysis. Should you or any other staff have any questions, we welcome you to call or email Erin Harris at 425-3795 (cell) or erin@starconsultingaz.com at your convenience. It is our intention that this submittal will meet the requirements of all departments and enable you to offer an approval of this analysis.

On February 1, 2013 staff responded with a finding that the Site Analysis is COMPLETE. The following items of concern, omission or question have been addressed by the Applicant prior to forwarding the Site Analysis to the Planning Commission.

The Site Analysis is tentatively scheduled for the April 24th Planning and Zoning Commission. As such, resubmittal of this Site Analysis is required no later than February 27th, 2013. Due to the required DRC hearing process, the Applicant is aware that the April 24th Planning Commission may no longer be feasible.

Dan Signor (Development Services Department)

1. Correct Exhibits I-A.4A and B to use the same color for the subject site as is used for the SR lots, not CR-4 lots.
Exhibit I-A.4A has been changed to reflect the subject property as SR. Exhibit B does not call out zoning, no changes made.
2. Exhibit I-A-4.b: Add the school on Cloud Rd, east of Sabino Canyon to the map.
The Fruchthendler Elementary School on Cloud Road, east of the property, is now shown.

3. Exhibit I-A.4.d. Provide the height in feet for adjoining structures within the required distance from the proposal.
The request height ranges have been provided in section I-A.4.c.
4. I-B.1.c. Delineate and label any sections of the site that are subject to the HDZ restrictions.
The slopes greater than 15% have been shown and labeled.
5. I-K.1.c: Delineate and label any portions of the site with 15% average cross slope and subject to HDZ as defined by 18.61.030.A: ... any land parcel, lot, or project site containing slopes of fifteen percent (15%) or greater, which are both longer than fifty feet (50') when measured in any horizontal direction and higher than seven and one-half feet (7.5') when measured vertically.
The slopes greater than 15% have been shown and labeled.
6. I-K.3 Delineate and label saguaros as required.
All saguaro's on the property are now called out.
7. II-A.2.a: Expand more fully, but briefly, why this is the best of all options for the site and how it enhances the physical features of the site and neighborhood, and how the development contains mitigation for the negative effects of development to the site and neighborhood.
Additional dialogue has been provided as requested.
8. II-A.2.c. The submitted site analysis lists neighbors' concerns about Drainage. Exhibit II-D.1: Developed Conditions, Drainage does not appear to correspond to the statement that drainage is to be directed to Sabino Canyon Road, since it appears that in the northwestern portion of the site drainage flows into Riverbend Estates. Clarify how neighbor's concerns have been addressed.
The neighbors concerns are only with Watershed 2, not Watershed 1. Watershed 2 has been redirected as discussed.
9. II-A.2.d: Identify the positive and negative effects of the proposed development on existing land uses within one-quarter mile from the boundaries of the site.
Additional discussion regarding the positive and negative effects has been provided.
10. II-A.2.c. State the specific Smart Growth principles from the <http://www.smartgrowth.org/why.php> website and describe how the proposal contributes. Note that these principles involve: 1) mixing land uses, 2) compact building design (to minimize building footprints), 3) creating a range of housing choices, 4) creating walkable neighborhoods, 5) creating distinctive, attractive communities with a strong sense of place, 6) preserving open space, 7) strengthen existing communities, 8) providing a variety of transportation choices, 9) making development decisions predictable, fair, and cost effective, and 9) encouraging community and stakeholder involvement in development decisions. (note that you can click on each Principle listed on the website for more information, if needed). Especially focus on how the project will encourage alternate modes of traffic and provide pedestrian and bike connections. Note that any direct quotes from publications must be identified in the bibliography per C.4 Written Format, Page 4.
Additional discussion has been provided in Section II-A.2.e as requested.
11. II-A. 3: Revise as necessary if the topographic survey indicates that there are portions of the site subject to the HDZ.
The section has been revised and the DRC Decision Letter has been included for your reference.



12. II-B.1: The 200 scale PDP on an 8 1/2 x 11" sheet is not sufficient to determine whether or not the proposal can comply with CR-4 Development Standards or to assess the impact of grading on adjoining properties or how the Circulation Path fits with the buildings. Provide three (3) copies of the PDP on a 24 x 36" sheet at an appropriate scale to determine the distance from setback lines, etc.
3 copies of the PDP is being provided at 24x36 per request.
13. II-B.1.b:
a. Show lot lines and the full dimensions of all buildings on adjoining properties within 150 feet of the property line.
All lot lines (building footprints) within 150' of property are now shown.
- b. Identify square feet of each proposed unit (or, alternatively, the unit type with the total number of each type and the sum of the square footage of each type), and provide the total square footage of all buildings. (Note that the CR-4 development standards include maximum lot coverage limitations for main buildings.)
The requested information has been added to the text.
14. II-B.1.d:
a. Designate an emergency access lane extending to Sabino Canyon Road south of the proposed ingress/egress driveway.
The developer respectfully declines this request as it has not been deemed necessary by the Fire Department or PCDOT for a development of this size.
- b. Delineate a connection between the interior circulation path and pedestrian facilities on Sabino Canyon Road that will connect to the bus stop at the Cloud Rd intersection.
The proposed pedestrian connection is shown on the PDP as well as several other exhibits.
15. II-B.1.m. Identify the utility in the bottom of the wash in the northwest corner of the site that apparently has been surveyed and staked. Provide information about any other easement, utility or otherwise, not shown that may be on site and delineate on the appropriate exhibits.
No utilities or easements are known to existing in this area. The cables seem to have been discarded or buried by some past dumping or vagrant activity.
16. II-B.1.0: Revise if required by average cross slope determination.
The areas of 5% set aside are shown on the PDP. The areas of slopes greater than 15% are shown on the Composite Map.
17. II-B.2.b: Provide building heights.
Building height is now stated on the PDP and is approximately 15'-6".
18. II-B.2.c. Total number of units.
Total number of units is now stated on the PDP.
19. II-B.2.g. Total acreage of recreational areas, and functional and natural open space, if any.
The requested areas have been added to the report as requested. Please note that these areas are preliminary at this time. The final landscape plans and recreation area plans will follow this preliminary plan but may vary slightly.

Mirela Hromatka (Regional Wastewater Reclamation Department)

No revisions, corrections or additions to the Site Analysis or PDP were requested by this reviewing agency.

Maggie Shaw (Department of Transportation)

I-Topography -1.c

1. Although this lot is not considered a classic Hillside Development Overlay Zone lot, there are natural slopes steeper than 15% that are longer than 50 feet and higher than 7.5 feet in the northwest portion of the site and not including River Rd cut slope, per HDOZ 18.61.030.A1. These slopes are on the west facing slope near the west property boundary and not including the additional slopes associated with banks of the small wash also located in this part of the lot. Therefore, the site is considered a hillside lot and is subject to Hillside requirements.

Acknowledged

2. The above slopes should be highlighted on Exhibit IB1.
The slopes are shown and labeled on the Exhibit.
3. Show and label the existing recorded slope easement that is depicted on Ex.1A2b on Ex IB1.
The slope easement is shown and labeled on the Exhibit.
4. Show and label the existing disturbed areas as shown on Ex. 1D7.
The Existing Disturbance has been shown and labeled on the Exhibit.

I-Traffic

1. The posted speed limit for Sabino Canyon Road is 40 mph.
Section I-F.1 has been corrected to reflect the posted speed limit on Sabino Canyon Road as 40 mph.
2. Ex. IF.3 Cloud Rd is a scenic major route, please adjust this layer with the bus route layer as it is blocked out.
The exhibit has been adjusted to more clearly see the separate layers.
3. Ex IF2 needs to include the existing right-of-ways for River Rd and Sabino Canyon Rd. Also the centerline of each needs to be shown. The centerline for River Rd will basically be 75 feet north of the existing property line, even where the right-of-way narrows to 125 feet. It is assumed that the future roadway or right-of-way widening would need to be on the north side of the centerline.
The centerline is now shown on the exhibit.
4. The NO U-turns at the River/Sabino Intersection for NB left turn needs to be discussed and will need to be addressed in the future Traffic Impact Study.
A limited discussion regarding the protected left turns for NB traffic and restriction to U-turn traffic has been added to Section I-F.1 as requested. A copy of the Traffic Statement prepared by Curtis Lueck and Associates, dated January 23, 2013 and emailed to you on January 28, 2013 has been provided with this submittal.



I-Exhibit I-H-1 Existing Recreational Facilities

1. Please check the layers for this - I don't see the dashed Fruchthendler Path and cannot distinguish several others.

The exhibit has been adjusted to more clearly show the existing facilities.

IK-Composite Map-

1. Include slopes greater than 15% as a characteristic and show and label on Ex. IK1.

The requested slopes are shown and labeled.

II- Project Overview-

1. Page 80- HDOZ should be deleted since this is a Hillside Development Overlay Zone lot.

The HDOZ has been removed from this section.

II-Preliminary Development Plan (PDP) and Traffic-

1. Correct the label to "105 feet Major Streets and Scenic Routes Plan building setback" for both River and Sabino Canyon Roads.

The label has been corrected per request.

2. Show and label the existing right-of-way for both adjacent roads.

The existing right-of-way for both roads is now shown on the PDP per request.

3. Show and label how many parking spaces there are and specify covered versus not covered.

The covered parking space structures are shown in the legend. The parking count has been added to the PDP as requested. The total number of spaces in a run is shown XX and the number of covered spaces included in that total is shown (XX).

4. Show and label on Ex. IIH5 the required curb and sidewalk or pedestrian path along both River and Sabino Canyon Rds. This is a high density development with curb and sidewalk requirements along all frontage. If there are issues such as drainage or utilities that would prohibit curb then a pedestrian path will be allowed.

The 12' asphalt path has been shown and labeled.

5. The existing conditions need to be shown for both adjacent roads.

The existing conditions, for both roads, are now shown on the PDP.

6. Discuss how the Traffic Impact Study will address the problems associated with prohibition of U-turns at the River/Sabino Canyon NB left turn, the high traffic volumes on Sabino Canyon Road and shall provide a queuing analysis of the gated entry that ensures sufficient storage capacity.

A Traffic Impact Study has been provided for your review.

7. Show and label the curb and sidewalk or pedestrian paths along both road frontages for Ex. IIH9.

The 12' asphalt path has been shown and labeled.

II-Topography and Grading-

1. Grading is limited to 80% per Table 18.61.054-1 (mass graded-multiple dwellings) plus perimeter slopes, cut/fills are limited, 20 feet wide bufferyard along both River and Sabino Canyon Rds required and riprap is limited per 18.61.054.H2 through H5.

Please refer to DRC application Co20-13-02. The exception for these requirements was approved with conditions by the DRC on March 21, 2013.



2. Discuss here whether variances or relief from the Hillside Development Overlay Zone is proposed. Since the entire parcel is to be graded this would be the approach needed. Change all references to the site not having 15% slopes.
Section II-C has been updated to reflect the presence of the HDZ slopes as well as the approved DRC exception.
3. For Ex. IIF4 - Provide the finished grade of the site and some grades along River and Sabino Canyon Rds. Label the 3 areas as more than 5 feet cut or fill. Show the remainder of the areas to be graded.
The requested grading information has been provided on the exhibit.
4. A detailed plan for permitting in the right-of-way is not required at rezoning but will involve DOT coordination and documentation of storm drain capacity prior to approval of the Development Plan or building permits.
Acknowledged
5. Release of the 25 feet slope easement will require analysis of the conditions during the grading plan review.
Acknowledged - the Applicant will work with Martin Stickford regarding the Release of the Easement at the time of Development Plan/Grading Plan review.

II-Recreation and Trails-

1. Discuss and show and label pedestrian path or curb and sidewalk on River/Sabino Canyon Rds along entire frontage on Ex. IIM 1.
The 12' asphalt pedestrian path has been shown and labeled on the exhibit.

Greg Hagen (Natural Resources, Parks and Recreation Department)

No revisions, corrections or additions to the Site Analysis or PDP were requested by this reviewing agency.

Courtney Rose (Pima County Office of Sustainability and Conversation, Cultural Resources)

1. The Pima County Office of Sustainability and Conservation, Cultural Resources and Historic Preservation Division recommends that an on-the-ground survey be conducted by a qualified archeologist prior to any ground modification activities.
The provided statement has been added to Section I-I.3 of the site analysis. The remaining text of that section has been slightly modified to incorporate the survey requirement.
2. The Arizona State Museum has identified that no previously recorded archeological or historic resources are known to exist on the site and no cultural resource surveys have been conducted on the site (see the Pima County Archeological Records Check Form, Exhibit I-L).
The provided statement has been added to Section II-N.1 of the site analysis.
3. Prior to ground modifying activities, an on-the-ground archeological and historic sites survey shall be conducted on the subject property, and submitted to Pima County for review. A cultural resources mitigation plan for any identified archeological and historic sites on the subject property shall be submitted to Pima County at the time of, or prior to, the submittal of any tentative plat or development plan. All work shall be conducted by an archeologist permitted by the Arizona State Museum, or a registered archeologist, as appropriate. Following rezoning approval, any subsequent development



requiring a Type 2 grading permit will be reviewed for compliance with Pima County's cultural resources requirements under Chapter 18.81 f the Pima County Zoning Code.

The provided statement has been added to Section II-N.2 of the site analysis.

4. In the event that cultural resources are revealed during ground-disturbing activities, all construction shall cease, and consultation shall be initiated with Arizona State Museum (ASM) to assess the potential significance of any unearthed materials (ARS §41-841). If human skeletal remains or funerary objects are discovered, ASM will be contacted immediately (ARS §41-865 and ARS §41-844).

The provided statement has been added to Section II-N.3 of the site analysis.

Greg Saxe (Regional Flood Control District)

1. Page 88 states that the site is "not located within a Critical Basin" and that therefore detention is not required. This is incorrect. Unless a waiver has been obtained retention/detention must meet balanced basin requirements. This statement needs to be changed prior to the final submittal. It is unknown whether or not this will result in a site analysis design and exhibit changes including Developed Conditions Drainage - and the PDP. The analysis does acknowledge that the specifics of both above and below ground drainage facilities will require detailed analysis at the development plan stage.

Section II.D.1 has been revised to indicate that the project is subject to Detention requirements.

2. While the agreement with the neighboring Riverbend Estates Community Association to redirect sheet flow away from them, thereby eliminating nuisance flooding and directing it to the ROW, reduces potential objections from neighbors, in the past, plans for pipes and culverts in the ROW have created some delays. While a detailed plan for permitting in the ROW is not required at rezoning it will involve DOT coordination and documentation of storm drain capacity prior to approval of the Development Plan. This has been acknowledged in the Site Analysis.

Acknowledged.

Frank Postilion (Regional Flood Control District, Water Resources)

No revisions, corrections or additions to the Site Analysis or PDP were requested by this reviewing agency.

Please call or email with any questions that you have regarding our submittal. We sincerely appreciate your cooperation and interest in our project.

Sincerely,



Erin Harris, P.E., LEED AP

