



## Coalition for Sonoran Desert Protection

300 E. University Blvd., Suite 120  
Tucson, Arizona 85705  
p (520) 388-9925 • f (520) 791-7709  
www.sonorandesert.org

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., 11<sup>th</sup> Floor  
Tucson, AZ 85701

**RE: Co7-14-03 Catalina Foothills Center General Partnership – N. Oracle Road**

Dear Supervisor Miller and Board Members:

Thank you for the opportunity to provide comments on the proposed N. Oracle Road Comprehensive Plan Amendment (Co7-14-03 Catalina Foothills Center General Partnership – N. Oracle Road).

This 50-acre parcel contains 12.5 acres of Important Riparian Area within the Conservation Lands System (CLS) of the Comprehensive Land Use Plan. The open space guidelines for Important Riparian Areas call for at least 95% open space. 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 onsite and/or off-site mitigation are included as a condition of approval 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,

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive, flowing style.

Carolyn Campbell, Executive Director