



**Coalition for
Sonoran Desert Protection**

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AGENDA MATERIAL
DATE 7/11/23 ITEM NO. RA 63

June 10, 2023

Arizona Center for Law
in the Public Interest
Arizona Master Naturalist
Association
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
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
Genius Loci Foundation
Great Old Broads for
Wilderness – Tucson
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
Southwestern Biological
Institute
Tortolita Alliance
Tortolita Homeowners
Association
Tucson Audubon Society
Tucson Herpetological
Society
Tucson Mountains
Association
Wildlands Network

Pima County Board of Supervisors
33 N. Stone Avenue, 11th Floor
Tucson, Arizona 85701

**RE: P22SP00003 UIP Quail Canyon I, L.L.C., ET AL. - N. ORACLE ROAD
Specific Plan**

Dear Board Members:

Thank you for the opportunity to provide comments on the proposed Quail Canyon Specific Plan before you for consideration today.

The Specific Plan rezoning proposal is located on approximately 53 acres, of which 22 acres are located within the Maeveen Marie Behan Conservation Lands System (CLS) classified as Important Riparian Area (IRA). Per the county’s Comprehensive Plan (Pima Prospers), the following Conservation Guidelines for IRAs state:

- *Across the entirety of the CLS landscape (not individual sites), at least 95 percent of the total acreage of lands within this designation shall be conserved in a natural or undisturbed condition*
- *Every effort should be made to protect, restore and enhance the structure and functions of IRA, including their hydrological, geomorphological and **biological functions** (emphasis added)*
- *Areas within an IRA that have been previously degraded or otherwise compromised may be restored and/or enhanced*
- *Such restored and/or enhanced areas may contribute to achieving the 95 percent conservation guideline for IRA*
- *Restoration and/or enhancement of degraded IRA may become a condition or requirement of approval of a comprehensive plan amendment and/or rezoning*
- *On-site mitigation is preferable, however mitigation may be provided on-site, off-site, or in combination*

As to the Quail Canyon Specific Plan, the staff report states,

Most of the existing IRA areas that are natural/undisturbed will be left natural except for some smaller pockets and the construction of a bridge to connect the development to Oracle Road. The remaining areas of the site that were previously denuded will be mitigated with supplemental plantings outside of the main wash flow areas to ensure viability. Flood Control District regulates CLS within the IRA and has addressed the mitigation guidelines for the IRA through rezoning conditions #5 E-F.

Coalition staff has been meeting with the property owner’s representatives since July 2022 and have had constructive conversations resulting in conserving more open space on the

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property than was originally planned, as well as making additional conservation commitments.

The Coalition can support the “North Parcel” proposal with the following additional conditions: that a mechanism to slow traffic to make egress safer from the development onto Rudasill, such as a HAWK signal, be installed at that intersection and that “SLOW - WILDLIFE XING” signage be placed appropriately at the east and west approaches to the Pima Wash on Rudasill.

Because of the proximity of the “South Parcel” to the Pima Wash and the wildlife movement corridor the wash provides, we recommend that the units on the South Parcel be attached. This would further reduce the footprint of the development and associated adverse impacts to wildlife due to noise, lights, and smells by clustering the development closer to the eastern bluffs and further from the Pima Wash, better buffering the Important Riparian Area and regional wildlife corridor provided by Pima Wash.

The Coalition’s priority is to maximize preservation of biologically important habitat such as the Pima Wash IRA. Configuration is key to this priority, as we continually emphasize to property owners. As such, we appreciate the latest language that the property owner has agreed to as an additional condition, to encourage attached units or other methods to increase the open space adjacent to Pima Wash, which states:

“To encourage additional open space preservation adjacent to the Pima Wash, for every 4,000 sq. ft. of natural open space preserved adjacent to the Pima Wash and within the South Parcel development area, the Project is allowed above what was approved on the Preliminary Development Plan one additional dwelling unit, not to exceed 120 dwelling units. This incentive does not waive any development standard as defined in the Specific Plan, including height and setbacks. The Project can accomplish this additional open space through revising the site layout and encouraging attached single family dwelling units. This provision applies to the South Parcel only.”

We would be in support of this Specific Plan request if the above language were made a condition of approval, as this is an issue we have been advocating since our discussions began (see above).

This may also help to address community concerns regarding housing affordability. We appreciate the developer’s continuing commitments to sustainability. Finally, we are including links to other issues mentioned in this letter, in hopes of including these wildlife elements in this development as well as others as appropriate in the future:

<https://www.phoenix.gov/streets/safety-topics/hawk-pedestrian-beacon-information>

<https://www.darksky.org/artificial-light-at-night-state-of-the-science-2022-report/>

<https://www.nps.gov/articles/effectsoflight.htm>

https://drive.google.com/file/d/1DkGrah2JpPDUZ_pWLC2GTv8CPjtTij0z/view?ts=6421b162

Sincerely,



Carolyn Campbell
Executive Director

CC: Terri Tillman, Principal Planner
Chris Poirier, Planning Director
Patricia Gilbert, Principal Hydrologist, RFCDD