



BOARD OF SUPERVISORS AGENDA ITEM REPORT

Requested Board Meeting Date: 8/2/2022

*= Mandatory, information must be provided

Click or tap the boxes to enter text. If not applicable, indicate "N/A".

***Title:**

P20SP00002 RIVER HOUSE TRUST, ET AL. – N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

***Introduction/Background:**

The applicant requests a comprehensive plan amendment and specific plan rezoning for approximately 34 acres from the Low Intensity Urban 1.2 (LIU-1.2) to the PDC (Planned Development Community) land use designation and from the SR (Suburban Ranch) and the CR-1 (Single Residence) zones to the SP (Specific Plan) zone located approximately 1,200 feet southwest of E. River Road and N. Craycroft Road intersection.

***Discussion:**

The specific plan rezoning proposes 177 independent senior living loft-style apartments in 19 buildings along with a country club and dining, bar & grill, wellness center and associated uses on Parcel A. An amenity food truck with additional Loop parking is also planned. Parcel B is a stand alone, 9-lot residential subdivision. Compliance with the Maeveen Marie Behan Conservation Lands System will be met through a combination of on-site and off-site mitigation.

***Conclusion:**

A plan amendment to PDC and a rezoning to the SP zone allows for the proposed uses and conforms to the policies of the Comprehensive Plan.

***Recommendation:**

Staff recommends APPROVAL subject to standard and special conditions and the Planning and Zoning Commission recommend DENIAL.

***Fiscal Impact:**

0

***Board of Supervisor District:**

☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ All

Department: Development Services - Planning

Telephone: 520-724-8800

Contact: Terrill L. Tillman, AICP, Principal Planner

Telephone: 520-724-6921

Department Director Signature: _____

Date: 7-12-22

Deputy County Administrator Signature: _____

Date: 7/12/2022

County Administrator Signature: _____

Date: 7/13/2022



TO: Honorable Rex Scott, Supervisor, District 1

FROM: Chris Poirier, Deputy Director *Chris Poirier*
Public Works-Development Services Department-Planning Division

DATE: July 12, 2022

SUBJECT: **P20SP00002 RIVER HOUSE TRUST, ET AL. – N. CRAYCROFT ROAD
SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT**

The above referenced Rezoning is within your district and is scheduled for the Board of Supervisors' **TUESDAY, August 2, 2022** hearing.

REQUEST: For a **comprehensive plan amendment and specific plan** for approximately 34 acres (parcel 109-26-003H, 109-26-005H, 109-26-005R and portions of parcels 109-26-003D and 109-26-004D) from the Low Intensity Urban 1.2 (LIU-1.2) to the Planned Development Community (PDC) land use designation and from the SR (Suburban Ranch) and the CR-1 (Single Residence) zones to the SP (Specific Plan) zone located approximately 1,200 feet southwest of the E. River Road and N. Craycroft Road intersection in Section 26, Township 13 South, Range 14 East, in the Catalina Foothills Planning Area.

OWNERS: River House Trust, et al.
Attn: City Redevelopment LLC TR
10606 Camino Ruiz, Suite 8130
San Diego, CA 92126-3263

AGENTS: Lazarus & Silvyn, P.C.
Attn: Keri Silvyn & Robin Large
5983 E. Grant Road, Suite 290
Tucson, AZ 85712

DISTRICT: 1

STAFF CONTACT: Terrill L. Tillman, AICP, Principal Planner

PUBLIC COMMENT TO DATE: As of July 12, 2022, staff has received 54 written comment letters in protest to the request and 6 letters in support of the request.

PLANNING & ZONING COMMISSION RECOMMENDATION: **DENIAL** 5 – 3 (Commissioners Becker, Hook and Maese voted NAY, Commissioners Truitt and Cook were absent).

STAFF RECOMMENDATION: **APPROVAL SUBJECT TO STANDARD AND SPECIAL CONDITIONS**

MAEVEEN MARIE BEHAN CONSERVATION LANDS SYSTEM DESIGNATIONS: A portion of the subject property is located within the Maeveen Marie Behan Conservation Lands System (CLS).

TD/TT/ds
Attachments



BOARD OF SUPERVISORS MEMORANDUM

SUBJECT: P20SP00002

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FOR AUGUST 2, 2022 MEETING OF THE BOARD OF SUPERVISORS

TO: HONORABLE BOARD OF SUPERVISORS

FROM: Chris Poirier, Deputy Director 
Public Works-Development Services Department-Planning Division

DATE: July 12, 2022

ADVERTISED ITEM FOR PUBLIC HEARING

COMPREHENSIVE PLAN AMENDMENT AND SPECIFIC PLAN

P20SP00002 RIVER HOUSE TRUST, ET AL. – N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

River House Trust, et al., represented by Lazarus & Silvyn, P.C., request a **comprehensive plan amendment and specific plan rezoning** for approximately 34 acres (parcel 109-26-003H, 109-26-005H, 109-26-005R and portions of parcels 109-26-003D and 109-26-004D) from the Low Intensity Urban 1.2 (LIU-1.2) to the Planned Development Community (PDC) land use designation and from the SR (Suburban Ranch) and the CR-1 (Single Residence) zones to the SP (Specific Plan) zone located approximately 1,200 feet southwest of the E. River Road and N. Craycroft Road intersection in Section 26, Township 13 South, Range 14 East, in the Catalina Foothills Planning Area. On motion, the Planning and Zoning Commission voted to recommend **DENIAL** 5 - 3 (Commissioners Becker, Hook and Maese voted NAY, Commissioners Truitt and Cook were absent). Staff recommends **APPROVAL SUBJECT TO STANDARD AND SPECIAL CONDITIONS**.
(District 1)

Planning and Zoning Commission Public Hearing Summary (January 26, 2022)

The public hearing was held virtually. Some commissioners were virtual while others attended through the telephonic option. Staff and the applicant attended and presented virtually.

Staff presented information from the staff report to the commission with a recommendation of approval subject to standard and special conditions.

A commissioner questioned why the access points were reduced from three to two. Staff replied

that apartments are not regulated by the same standard as residential development for the number of access points required. Apartments are identified as commercial uses and they are allowed to have a single access per County standards. An additional, secondary fire (emergency) access has been provided to meet the fire jurisdictional requirement.

The applicant's representative presented additional information about the proposed project and discussed that there was no exception needed for access to the site. She discussed the proposal at length and provided a Power Point presentation illustrating the proposal and architectural elements. The landscape architect provided details about the existing condition, the Conservation Lands System (CLS) and the wildlife corridor.

Staff clarified that the strict application of CLS compliance on properties with historical disturbance that precedes the CLS is predicated on site specific projects.

A commissioner asked about the total amount of CLS mitigation that would normally be required. Staff replied that the Office of Sustainability and Conservation administers the compliance with CLS, however, Flood Control District manages compliance with Important Riparian Areas, considered to be of higher ecological value and can be used as mitigation for CLS disturbance. The strict application of the CLS would be an approximate, 19 additional acres of on- or off-site mitigation.

The hearing was opened to the public.

Speaker #1 stated that there are a number of rabbits, roadrunners, hawks, coyote and javelina on this property adjacent to the Loop that she utilizes about 6 days a week and is concerned about the injury that the development may cause to the wildlife. She further commented that these are the same animals she grew up with as a child where she would explore the Rillito River near Fort Lowell Park and she is grateful that the County has provided the Loop amenity, preserved the rural landscape and the river from flooding. She shared her concern with the 45-foot-high buildings, the mountain views that will be destroyed and the sense of place that will be denuded. She urged the Commission to reject the proposal.

Speaker #2 urged the Commissioners to reject the rezoning in order to preserve the wildlife corridors and views. She stated that people do not come to Pima County to see apartment buildings, but for the beautiful mountain views as demonstrated on her screensaver. As you can see, there is a beautiful view of the mountains and trees that are about 30 feet tall.

Speaker #3 discussed that she lives just outside the 300-foot notification area and thanked the Commission and the County staff for their hard work shaping the future of Tucson and maintaining our wonderful community. She supports her neighbors in making compelling arguments about the impacts of the rezoning on traffic and light pollution. Her home is not at a significantly higher elevation and the majority of her windows face the development. Her family concern is the important riparian area that runs through the development. She has a riparian area on her eastern quarter of her land that may not be developed and her family is committed to protect the riparian area for the benefit of nature and the broader community and it appears that the riparian areas were not addressed in the presentation and she is not convinced that it is consistent with the CLS. She further stated that the land has not been actively farmed for many years and it is dense with creosote bush mesquite trees, cacti and brittle brush and she does not believe the assessments reflect the ecological value done with the footprint of this development. She stated that it is frustrating to value and appreciate the benefits of the riparian qualities of the land knowing that it may be ignored downstream overall. She discussed that her and her husband's favorite parts of

the Loop, along with her husband, are the areas set back from the city providing amazing mountain views and getting a peek at historic ranches and horse properties where people linger on the path to enjoy.

Speaker #2 spoke again and discussed that the terms of active baby boomer and senior citizen were used frequently in the presentation and that is exactly what she is, yet she does not feel like this project serves her or her community in the slightest. She stated opposition for the proposal because of the traffic on River Road at peak hours. It takes over 5 minutes to make a right hand turn from the intersection of River Road and Craycroft Road. The intersection has been developed to such a degree that there are many driveways across from each other that when you are making a right hand turn, you are looking across 4 lanes of traffic and she doesn't understand why we would want to wedge an additional 200 living units with 3-story buildings which will block views and the open sky from the Loop. The streets cannot support more traffic for the 22 residential lots and all of the amenities of the senior living development. She further stated that the Loop itself does not have enough parking many months of the year and there will be so many more people using the parking and the developer is treating the Loop as a draw to their development which is private and the Loop is public and is meant for the community. The Loop does not need to be commercialized with an Airstream food service, as it is meant to be a nature trail for people and wildlife. She stated that she believes that tax payer money built the Loop and the community asset will be used by a private corporation to draw more people into the area and destroy what was built for the community along with the wildlife habitat. It's the wildlife habitat that makes our area special and if this property is developed, it will destroy the very thing that draws people to the foothills and Tucson.

Speaker #4 spoke on behalf of the Coalition for Sonoran Desert Protection. She stated that the Coalition has significant concerns with this proposal because of the impacts to the biological resources. The wildlife connectivity has been documented as a significant wildlife corridor that connects a number of protected habitats such as parks and forest lands to the river. The staff report indicates that due to its proximity to the Rillito Creek, the site likely facilitates some north, south wildlife movement between the Rillito and the Santa Catalina Mountains which could be disrupted by this project. The riparian mitigation along the internal drainageway may mitigate these impacts and special care should be taken when designing this new habitat to ensure that it can facilitate wildlife movement across the site. She further discussed that the site is a priority conservation area for federally listed or at risk species and cannot support the project as proposed.

Speaker #5 discussed her concerns with the nearby construction and the safety of the water tables and well quality and requested that the Commissioners recommend denial of the proposal. She stated that Parcels A and B should be linked together and questioned whether the emergency access would truly be utilized only by Rural Metro and suspected that deliveries will come through the emergency access due to the limited maneuverability of large trucks and questioned the amount of traffic the project will generate and closed by asking the Commission to protect rural spaces, the environment and the existing residences.

Speaker #6 questioned whether the development is truly "infill" and thinks that this is an expansion of a dense urban environment along the Loop. As a Loop rider, he believes that the area around Campbell Avenue seems to be similar to this and his heart sinks each time he rides by and urged the developers to not expand into his rural area.

Speaker #7 discussed that this development will impact him personally, five days a week, due to the increased traffic east of the site and requested that the Commission reject the proposal.

Speaker #8 discussed that the project should be rejected due to the impact on groundwater depletion, lack of solar, removal of native vegetation without adequate mitigation strategies, climate change, increased traffic and congestion, viewshed obliteration, negative impact to Loop users, desert habitat disruption and community disruption. She further stated that the project will create a point source to discharge pollutants into the Rillito in violation of the Clean Water Act.

Speaker #9 stated that he supports this project as it is well designed and will be owned and operated by a company who is nationally respected. He reasoned that the proposal is consistent with other uses allowed on both sides of the Rillito River between Oracle Road and Craycroft Road and is consistent with the community goal of promoting high-quality, well-designed infill projects that take advantage of existing infrastructure. He stated that the viewsheds will not be obstructed due to the significant change in elevation from the houses to north of the project. The project will be a low impact-traffic generator and he supports the additional amenities to the Loop, the newly created parking spaces and refreshment stand.

Speaker #10 representing the Tucson Historic Preservation Foundation stated that he is in opposition to the project due to its cultural significance because of its proximity to the confluence of the Pantano Wash and Rillito River. This is part of the rural cultural development of our community and region as well as part of the Fort Lowell area that was established because of the water sources and the fertile land and its distinctive intact cultural landscape when you walk along the Loop. It is one of the few places that really have this sense of place within the urban fabric of the city. Since the 1930's, taxpayer dollars and federal funds have been used to protect cultural resources in this area. It was one of the first historic districts and a multiple resource area listing the Fort Lowell resources. He believes the 3-story project will have visual impacts that will diminish the remarkable part of our city and directly undermine the millions of dollars of funds going to the Fort Lowell Park. The watershed and water course would be diminished in perpetuity and we would not be able to get it back. He strongly opposes this project and requests that the Commission reject the proposal and recommend denial to the Board of Supervisors.

Speaker #11 stated he is an adjacent neighbor and the developers worked with him on his concerns for building location and height to maintain the view corridors and he is supportive of the project.

Speaker #12 questioned why Parcel A and B are being considered together. He stated that he just moved here from the Phoenix area because he wanted more mountain views, nature and wildlife and found this to be a very special neighborhood. He doesn't agree with 0.3-acre lots and doesn't believe that this is common sense in an area not specifically zoned this way.

Speaker #13 discussed that the comprehensive plan amendment and specific plan give the developers the control to determine the context of the environment without consideration for the surrounding community, its residents, including indigenous wildlife and questioned why this is appropriate for his neighborhood as many residents have said. He moved there for the low-density housing, the wildlife and views. He discussed that the street standards indicated the need for three access points and the project will cram all of that into one access point which will create a chokepoint and questioned when the rules stop changing. He states that he and his family do not support this proposal and requested that the Commission reject the proposal.

Speaker #14 stated agreement with the previous speakers who have objected to the proposal.

Speaker #15 believes that the inclusion of the community that is directly impacted was very short in nature, as the first meeting was January 10th and the hearing is today, two-weeks later. The issues discussed were bogus because of the limited time. A number of neighbors were not

notified of the change. He continued to discuss the traffic associated with the proposal and the loss of service on River Road, Craycroft Road and Camino Blanco and stated they don't meet the standard for the current traffic.

Speaker #16 stated that he is an immediate neighbor of the proposed project and opined that Pandora's Box has been opened in the neighborhood and recommends that the Commission reject this proposal.

The applicants discussed the public comments at length and provided project details.

The commissioners asked about details regarding the driveway access to the project. The applicant provided additional details about the proposed access and discussed that the approval will be in conjunction with Flood Control District approval.

The public hearing was closed.

Commissioner Gungle made a motion to recommend **DENIAL**; Commissioner Matter gave second.

A commissioner discussed that the development is good and the design has many attributes that are solid, but it is located in the wrong place.

A commissioner requested that the commission consider that this is an urban property, it was rural only in history and its diminished considerably. She stated concern for the width of the wildlife corridor that may not be wide enough to be effective.

A commissioner discussed the merits of the proposal and stated that he puts a lot of weight on whether or not the Coalition for Sonoran Desert Protection support a request. It appears that the proposal for CLS mitigation doesn't go far enough and he believes the project is at the extreme of development with 3-stories and the proposed densities.

A commissioner discussed the history of the area and agreed with the previous comments by a commissioner that this is the right project in the wrong place.

The commission voted to recommend **DENIAL** of the rezoning (5 – 3, Commissioners Becker, Hook and Maese voted NAY, Commissioners Truitt and Cook were absent), subject to the following conditions:

IF THE DECISION IS MADE TO APPROVE THE SPECIFIC PLAN, THE FOLLOWING REQUIREMENTS SHOULD BE MADE CONDITIONS OF APPROVAL. THE FOLLOWING CONDITIONS MAY RESIDE WITHIN THE SPECIFIC PLAN DOCUMENT:

1. Not more than 60 days after the Board of Supervisors approves the specific plan, the owner(s) shall submit to the Planning Director the specific plan document, including the following conditions and any necessary revisions of the specific plan document reflecting the final actions of the Board of Supervisors, and the specific plan text and exhibits in an electronic and written format acceptable to the Planning Division.
2. In the event of a conflict between two or more requirements in this specific plan, or conflicts between the requirements of this specific plan and the Pima County Zoning Code, the specific plan shall apply. The specific plan does not regulate Building Codes.

3. This specific plan shall adhere to all applicable Pima County regulations that are not explicitly addressed within this specific plan. The specific plan's development regulations shall be interpreted to implement the specific plan or relevant Pima County regulations.
4. Transportation conditions:
 - A. Prior to development permit approval for the senior living facilities, any required access easement(s) within Regional Flood Control District property for the senior living facilities shall be obtained by the owner with the District and/or Real Property Service.
 - B. Prior to development permit approval for the senior living facilities, proof of coordination with the City of Tucson Transportation Department shall be provided to Pima County Development Services.
 - C. Cross-access between Phase 1 development (Senior Living Facilities) and Phase 2 development (Block 1 and 21 residential lots) shall be prohibited with the exception of providing emergency access only through a gated entrance. Any shared access easement between the developments shall be provided by the owner.
 - D. The property owner(s) shall accept responsibility for the maintenance, control, safety and liability of privately owned roads, drives, physical barriers, drainageways and drainage easements.
 - E. River House Road between Camino Blanco and Camino Blanco Place shall be paved to Pima County Standards and it is subject to Department of Transportation approval. Off-site improvements shall include intersection improvements for Block 1 access onto the Camino Blanco/River House Road intersection.
 - F. An updated Traffic Impact Study (TIS) shall be submitted for review and approval by the Department of Transportation with the submittal of each phase. Off-site improvements determined necessary as a result of the traffic impact study shall be provided by the property owner.
5. Flood Control District conditions:
 - A. A 408 Permit and a Facilities Impact Permit is required for any modifications to the Rillito River Bank protection, the Loop or mitigated 404 vegetation on District property. Adequate detention/retention facilities shall be constructed on site to ensure that the Loop is not impacted by greater flood peaks, flood volumes, or flood frequency than current conditions.
 - B. The development shall meet the flood mitigation standards for a critical facility, including elevation.
 - C. Riparian mitigation shall be placed within drainage features and as a 50' buffer to the Loop.
 - D. First flush retention shall be provided in LID practices distributed throughout the site.
 - E. At the time of development the developer shall be required to select a combination of Water Conservation Measures from Table B such that the point total equals or exceeds 15 points and includes a combination of indoor and outdoor measures.
 - F. If the improvements are proposed within the effective FEMA Special Flood Hazard Area, both a CLOMR and LOMR are required. The CLOMR shall be approved by FEMA prior to District approval of the site construction permit.
6. Regional Wastewater Reclamation conditions:
 - A. The owner(s) shall construe no action by Pima County as a commitment of capacity to serve any new development within the rezoning area until Pima County executes an agreement with the owner(s) to that effect.
 - B. The owner(s) shall obtain written documentation from the Pima County Regional Wastewater Reclamation Department (PCRWRD) that treatment and conveyance capacity is available for any new development within the rezoning area, no more than 90 days before submitting any tentative plat, development plan, preliminary sewer layout, sewer improvement plan, or request for building permit for review. Should

- treatment and/or conveyance capacity not be available at that time, the owner(s) shall enter into a written agreement addressing the option of funding, designing and constructing the necessary improvements to Pima County's public sewerage system at his or her sole expense or cooperatively with other affected parties. All such improvements shall be designed and constructed as directed by the PCRWRD.
- C. The owner(s) shall time all new development within the rezoning area to coincide with the availability of treatment and conveyance capacity in the downstream public sewerage system.
 - D. The owner(s) shall connect all development within the rezoning area to Pima County's public sewer system at the location and in the manner specified by the PCRWRD in its capacity response letter and as specified by PCRWRD at the time of review of the tentative plat, development plan, preliminary sewer layout, sewer construction plan, or request for building permit.
 - E. The owner(s) shall fund, design and construct all off-site and on-site sewers necessary to serve the rezoning area, in the manner specified at the time of review of the tentative plat, development plan, preliminary sewer layout, sewer construction plan or request for building permit.
 - F. The owner(s) shall complete the construction of all necessary public and/or private sewerage facilities as required by all applicable agreements with Pima County, and all applicable regulations, including the Clean Water Act and those promulgated by ADEQ, before treatment and conveyance capacity in the downstream public sewerage system will be permanently committed for any new development within the rezoning area.
7. Environmental Planning condition: Upon the effective date of the Ordinance, the owner(s)/developer(s) shall have a continuing responsibility to remove buffelgrass (*Pennisetum ciliare*) from the property. Acceptable methods of removal include chemical treatment, physical removal, or other known effective means of removal. This obligation also transfers to any future owners of property within the rezoning site; and Pima County may enforce this rezoning condition against the property owner.
 8. Cultural Resources condition: In the event that human remains, including human skeletal remains, cremations, and/or ceremonial objects and funerary objects are found during excavation or construction, ground disturbing activities must cease in the immediate vicinity of the discovery. State laws ARS 41-865 and ARS 41-844, require that the Arizona State Museum be notified of the discovery at (520) 621-4795 so that cultural groups who claim cultural or religious affinity to them can make appropriate arrangements for the repatriation and reburial of the remains. The human remains will be removed from the site by a professional archaeologist pending consultation and review by the Arizona State Museum and the concerned cultural groups.
 9. Adherence to the specific plan document as approved at the Board of Supervisor's public hearing.
 10. In the event the subject property is annexed, the property owner shall adhere to all applicable conditions, including, but not limited to, development conditions which require financial contributions to, or construction of infrastructure, including without limitation, transportation, flood control, or sewer facilities.
 11. The property owner shall execute the following disclaimer regarding the Private Property Rights Protection Act rights. "Property Owner acknowledges that neither the rezoning of the Property nor the conditions of rezoning give Property Owner any rights, claims or causes of action under the Private Property Rights Protection Act (Arizona Revised Statutes Title 12, chapter 8, article 2.1). To the extent that the rezoning or conditions of rezoning may be construed to give Property Owner any rights or claims under the Private Property Rights Protection Act, Property Owner hereby waives any and all such rights and/or claims pursuant to A.R.S. § 12-1134(I)."

TD/TT/ds
Attachments

c: Silvyn & Lazarus, P.C.

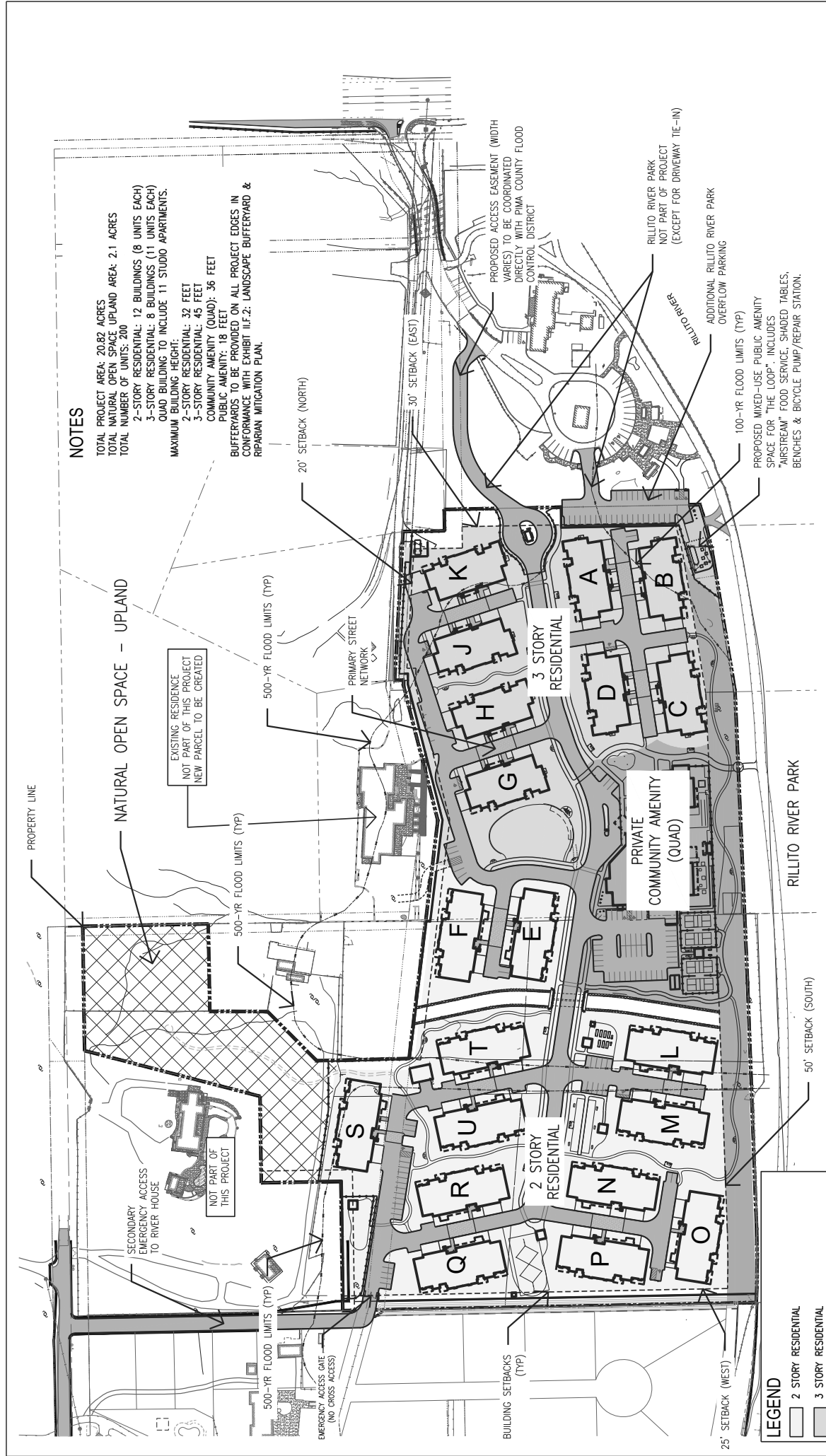


EXHIBIT I.IA.1

ENDEAVOUR CONCEPT PLAN

ENDEAVOUR CATALINA FOOTSTEPS

150 75 0 150 300

SCALE: 1" = 150'

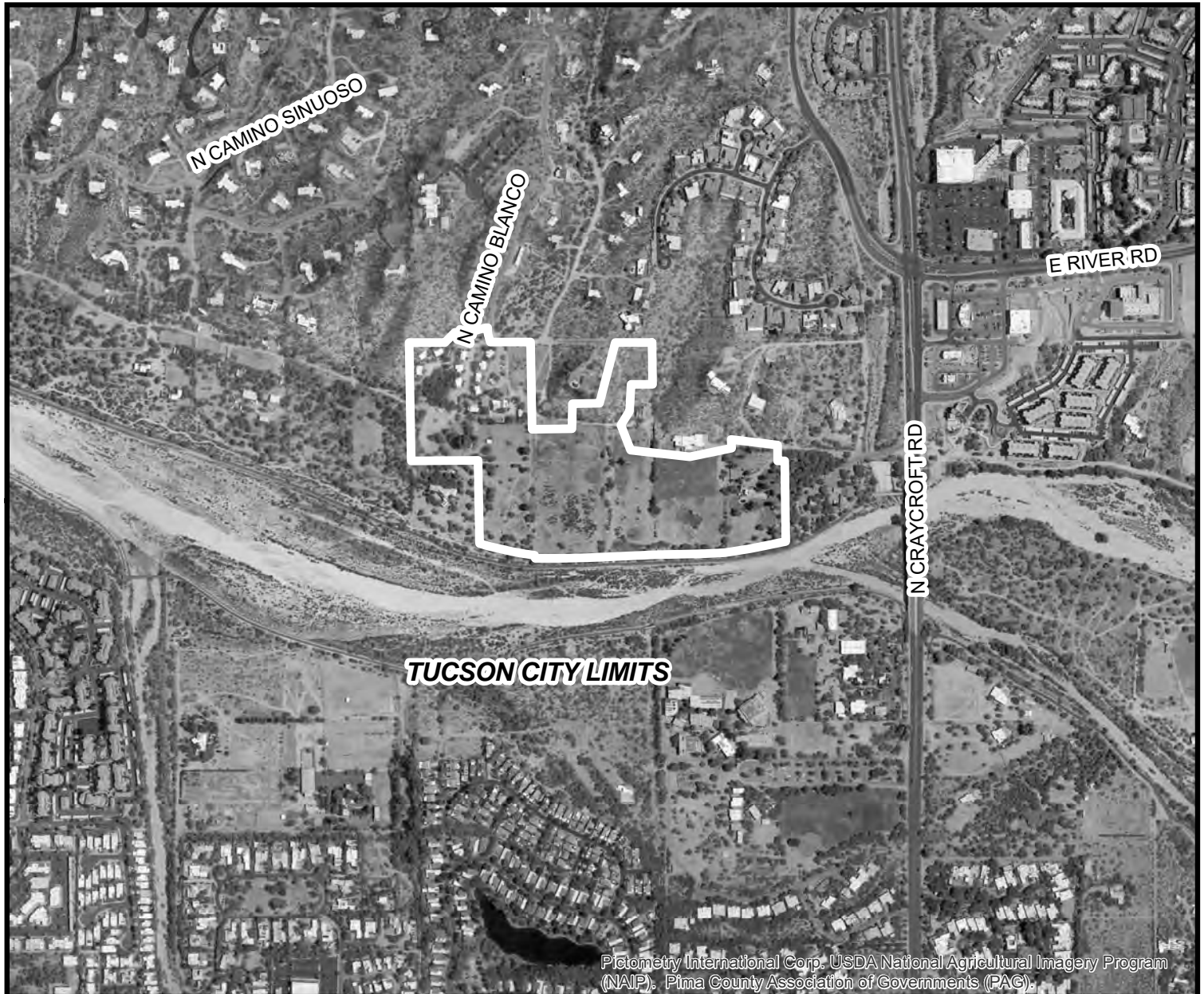
Case #: P20SP00002

Case Name: RIVER HOUSE TRUST, ET AL.-

N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

Tax Code(s): 109-26-003H, 005H, 005R & portions of 109-26-003D, 109-26-004D

Aerial Exhibit



0 360 720 1,440 Feet

**PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION**



Notes:

Map Scale: 1:10,000

Map Date: 12/29/2021 - ds





**SPECIFIC PLAN
PLANNING AND ZONING COMMISSION
STAFF REPORT**

HEARING DATE	January 26, 2022
CASE	P20SP00002 Endeavour Spirited Living Specific Plan
SUBREGION	Catalina Foothills
DISTRICT	1
LOCATION	The property is located approximately 1,200 feet southwest of the intersection of E. River Road and N. Craycroft Road.
ACREAGE	34 (+/-) acres
REQUEST	A Comprehensive Plan Amendment and Specific Plan Rezoning for Independent Living and a Residential Subdivision. The comprehensive plan amendment request is from the Low Intensity Urban 1.2 (LIU-1.2) to the Planned Development Community (PDC) land use designation and the rezoning request is from the CR-1 (Single Residence) and SR (Suburban Ranch) zones to the SP (Specific Plan) zone.
OWNER	Craycroft TR, Hutchison Gregory K and Perry Pamela A, River House TR and Lopez Pat III
AGENT	Lazarus & Silvyn P.C. Kerry Silvyn

APPLICANT'S PROPOSED USE

The applicant proposes a comprehensive plan amendment and specific plan rezoning for an approximate 34-acre site comprised of three parcels and a portion of two parcels for independent living (20.82 acres, referenced as Parcel A) with up to 200 loft-style apartments in two-and three-story residential buildings, country club with dining, bar & grill, coffee bar, wellness center, a lecture hall along with indoor/outdoor life-enrichment amenities and a 22-lot residential subdivision. Within the 13.18-acre residential subdivision (referenced as Parcel B), there are 21-lots and Block 1 which has been previously developed with 10 residential units that will remain. Lots 1 and 2 also each contain one existing residential unit that will also remain. The site will connect to the Chuck Huckelberry Loop in two separate locations, each serving either Parcel A or Parcel B. A food truck with additional Loop parking is planned on the southeast end of the specific plan area along with an interpretive sign to memorialize the historical period Schroeder's well and Davidson flume cultural resources. The independent living three-story apartment buildings and the country club style amenity building are planned for a maximum height of 45-feet. The two-story apartment buildings are planned for a maximum height of 32-feet, the private community building is planned for a maximum 36-foot height and the residential component is planned for a maximum 24-foot height.

APPLICANT'S STATED REASON

"The mixed-use development will primarily feature residential uses at varying densities with supporting uses and amenities. On the eastern 21 acres, Envisage Living Communities is proposing to develop Endeavour Spirited Living, a unique independent living environment for

healthy active adults that emphasizes successful, healthy aging and longevity in a small neighborhood setting. The project is adjacent and complimentary to the Chuck Huckelberry Loop trail system and amenities.”

STAFF REPORT SUMMARY

Staff recommends **APPROVAL** of the Endeavour Spirited Living Specific Plan (SP) rezoning and the plan amendment to Planned Development Community (PDC). The plan adheres to Regional Plan Policies and is located within the Chuck Huckelberry Loop Focused Development Investment Area that encourages efficient infill growth.

PUBLIC COMMENT

As of the writing of this report, January 12, 2022, staff has not received any comments.

Published and mailed notice of the proposal along with the website posting of the application and specific plan will occur a minimum of fifteen days prior to public hearing. A draft staff report will be available a minimum of fifteen days prior to public hearing with the final version posted to the website. The website will be updated to include public comment throughout the process to the Planning and Zoning Commission and the Board of Supervisors.

COMPREHENSIVE PLAN AND REGIONAL PLAN POLICIES

The land use designation of the subject site is Low Intensity Urban 1.2 (LIU-1.2) and the planned land use designation is Planned Development Community (PDC).

The LIU-1.2 land use designation plans for low density residential uses and other compatible uses and to provide incentives for residential conservation subdivision to provide more natural open space. Density bonuses are provided in exchange for providing open space. There is no minimum residences per acre (RAC) density and the maximum RAC is 1.2 without a density bonus. The LIU-1.2 plan density bonus allows a maximum RAC of 2.5 with a minimum of 45% open space.

Approval of the Specific Plan rezoning and concurrent plan amendment will change the LIU-1.2 land use designation to the Planned Development Community (PDC) designation, which will bring the Specific Plan (zoning) and Comprehensive Plan land use designation into conformity with the comprehensive plan. The PDC land use designation allows specific plans to demonstrate the intent for a specific plan area as a whole.

Special Area Policy S-2, Catalina Foothills applies to the site. The policy limits the height of structures to 24 feet unless approved by the Board of Supervisors. If the concurrent plan amendment and specific plan are approved, the proposed heights are in conformance with the policy. No rezoning policies are applicable to the site.

The proposed uses are supported by a number Comprehensive Plan Regional Policies referenced within the specific plan, a few are listed below:

- Integrate healthy community concepts and principles into land use, social service, and infrastructure planning.
- Increase access to resources and healthy options that support physical health and wellness.
- Promote the overall wellness by providing access to:
 - Alternative modes of transportation (walkways, trails and bike paths) that encourage exercise.
 - Healthy foods

- Promote the establishment of a comprehensive and integrated system of parks, plazas, and playgrounds, and a trails system that provides connectivity to residential area, employment, services, schools, libraries, activity centers and other community amenities.
- Encourage the development of retail, commerce, employment and mixed-use residential projects in Focused Development Investment Areas and in other planning areas where infrastructure is in place or planned.
- Incorporate through good design, housing types within mixed-use developments at scales generally compatible, but more dense than adjacent established neighborhoods.

SURROUNDING LAND USES/GENERAL CHARACTER

North:	SR/CR-1	Church/Developed Residential Subdivision/Developed Residential
South:	SR/RX-2	Rillito Creek, St. Gregory School/City of Tucson Residential
East:	SR/SR-2	Developed Residential/Rillito River Park and Loop Access Road
West:	SR	Developed Residential Subdivision

The area is primarily characterized with a mix of higher- and lower-density residential development. The higher-density residential properties lie to the south of the Rillito Creek and east of Craycroft Road. Lower-density residential development exists in well-established neighborhoods north of the subject property spanning approximately two miles, to just south of Sunrise Drive. These larger, lower-density lots are a result of the areas Hillside Development Zone designation north of the Rillito Creek. The nearest commercial services are located at the northeast and southeast corners of the intersection of Craycroft Road and River Road approximately one-quarter of a mile away from the subject site. The commercial centers offer grocery, restaurant, retail and personal services. There are elementary and private schools, churches and Tucson Medical Center within a one-mile radius of the site. Recreational opportunities exist adjacent to the site with the Craycroft Trailhead and the Chuck H. Huckelberry Loop Rillito River Park supporting equestrian, bicycle and walking paths. Fort Lowell Park and golfing opportunities are nearby.

PREVIOUS REZONING CASES ON PROPERTY

There were two previous rezonings for the northern portion of the referenced Parcel B within the specific plan. Rezoning case Co9-64-012 was approved for CR-1 zoning in 1964 with no conditions. A rezoning to CR-3 (Single Residence) by case Co9-98-046 applied for and was subsequently withdrawn.

PREVIOUS REZONING CASES IN GENERAL AREA

Recent activity:

There have not been any recent rezoning cases in the general area.

Past activity:

Most properties north of the Rillito Creek were rezoned from the original SR zoning to the CR-1 zones in the 1970's under the Catalina Foothills Zoning Plan. Areas to the south of the Rillito Creek were rezoned in the 1960's through the 1970's for more dense residential projects, primarily CR-3 zoning and subsequently annexed into the City of Tucson. Commercial rezonings to the TR, CB-1 and CB-2 from the 1970's thru the mid 1980's and one rezoning in 2002 resulted in the intensely developed commercial uses and apartments along the Craycroft Road major transportation corridor.

MAEVEEN MARIE BEHAN CONSERVATION LANDS SYSTEM (CLS)

Portions of the site are located within the Maeveen Marie Behan Conservation Lands System (CLS). There are approximately 5.45 acres within the Biological Core Management Area (BCMA)

and approximately 3.91 acres of Important Riparian Area (IRA). The areas of the BCMA were disturbed prior to the adoption of the CLS, therefore no mitigation is required. The IRA areas of the site are regulated by the Pima County Regional Flood Control District (RFCD) and CLS compliance will be met through a combination of natural open space set aside and enhanced functional open space.

PLANNING REPORT

Staff supports the request because the subject site is located within the Chuck Huckelberry Loop Focused Development Investment Area (FDIA) and the specific plan uses, heights and densities are supported by the policies of Pima Prospers, Pima County's comprehensive land use plan. FDIAs are considered growth areas in the County and Pima Prospers policies encourage the provision of gathering areas (courtyards, plazas, river walks) and other amenities that attract, support, encourage and retain a healthy workforce and appeal to multigenerational families. Growth areas also encourage activity centers appropriate in scale and location and support a regional transportation network that includes multi-modal opportunities with bike paths and electric vehicle recharging stations. The independent living development will provide approximately 50 job employment opportunities and will incentivize employees to ride-share and utilize public transportation. The mixed-use independent living and residential subdivision promote live/work opportunities and efficient growth in urban areas compatible with the scale, character and identity where infrastructure is planned or in place.

The independent living will be accessed through a newly created shared access easement from the existing main access road for the Rillito River Park property owned by RFCD. The proposed easement requires coordination with RFCD and requires Board of Supervisor approval. The existing Rillito River Park access and parking area will remain. The parking area will be extended and an amenity area (food truck) added as part of the private agreement. The applicant has been working with RFCD and will coordinate the Board of Supervisor's action on the private agreement and Specific Plan. The residential access will be via River Tree House Road and Camino Blanco to the north. There will be no shared access between the residential component and the independent living.

Multi-modal forms of transportation will be employed within the independent living development with access to the Loop for pedestrian and bicycle exercise. Shared electrical vehicles will be available for use by the residents reducing the necessity for private vehicular ownership which will help to reduce greenhouse gas emissions. Active and passive recreation are planned including internal pedestrian paths to the shared amenities and the Loop, bocce ball courts, croquet, pickle ball courts, community garden, gym, and a dog park or any combination of the recreational uses. Multi-modal forms of transportation with striped lanes for bicycle access to the site exist along the Craycroft Road thoroughfare with cross-access for bicycles and pedestrians under the bridge that spans the Rillito Creek.

The independent living development will consist of 20 apartment buildings containing a maximum of 200 units or a density of 10 RAC. The three-story apartment buildings and the country club style amenity building located on the eastern half of Parcel A are planned for a maximum height of 45 feet. The two-story apartments located on the western half of the development are planned for 32 feet in height, and the private community building is planned for 36-feet. The site setbacks for Parcel A are 20 feet along the northern boundary, 50 feet along the southern boundary, 25 feet along the western boundary and 30 feet along the eastern boundary with the exception of the amenity area that may be located within the setback along the southeast corner of the project. Accessory structures and uses such as a guard house or entry gate, utility and storage structures, the dog park structure to facilitate dog care may be allowed within the site setbacks.

The residential component of Parcel B will contain a total of 31 dwellings. Block 1 (3.6 acres) has 10 rental units that will remain. The proposed residential subdivision will contain 22 lots (21 lots and Block 1). Lots 1 and 2 have existing single-family residential rental units and the remaining 19 lots will be developed with single-family residences for rent or sale. The subdivision's minimum lot size is 7,000 square feet with no maximum lot coverage. The residential density is planned for 2.26 RAC (up to 31 units). The lots are planned for a 20-foot front yard setback, a 10-foot side and rear yard setback and a maximum height of 24 feet and 2 stories. Parcel B will contain a 1.0 acre area for passive recreation within the set-aside common areas and provide private river park access connection to the Loop along the eastern border of the residential development.

Architectural guidelines will be employed within the development. Desert Modern architecture is planned for Parcel A. The architecture will use natural and native materials and finishes in muted, natural/earth tone colors. Materials to be used are stone, stucco or EIFS wall construction materials, accented plank and pole wood and accent metal railings and canopy coverings enhancing the resort like character of the development. Parcel B will be designed to blend in with the residential character of the existing and surrounding uses. Signage for the development is unique to the specific plan which contains a master signage plan. A monument sign and elements such as internal directional signage and building signs are planned.

The proposed bufferyards are intended to enhance the existing types of vegetation to integrate the development with existing conditions. The north bufferyard will vary between 0 to 20 feet-wide and is proposed as a mesquite bosque containing a higher density of velvet mesquite; 50% of the trees to be planted shall be 36-inch box size. The southern bufferyard adjacent to the Loop will be a minimum width of 50 feet, contain riparian habitat mitigation along with a combination of paved and unpaved internal pedestrian circulation paths. Public amenities, including a diner, shade structures, tables and seating areas may be located within the bufferyard. The eastern bufferyard will vary between 0 and 10 feet. The bufferyard located in between Parcel A and Parcel B is planned for 25 feet-wide and will include a 6-foot wall.

Most of the property has been previously disturbed for historical agricultural uses. There is an approximately 2.1-acre area of Hillside Development Zone (HDZ) on the northernmost portion of the site. HDZ is defined as any 50-foot or greater distance containing a slope rising 15% or more in elevation. The proposal will avoid the hillside area with the exception of the man-made berm that appears to have been constructed to divert the water coming from the northern hillside areas for the agricultural uses. This berm is not a natural feature and not subject to HDZ and will become a future drainageway.

Within Parcel A, the easternmost parcel, adjacent to the Rillito River Park has an existing house, pool and accessory buildings that will be razed. A few accessory buildings adjacent to this lot located along the parcel boundary to the west will also be razed.

The site contains Important Riparian Areas that were previously disturbed. Riparian habitat mitigation will include the 0.8-acre drainageway which will become an improved channel with additional plantings. This drainageway will also provide a wildlife linkage through the project for wildlife movement. Most of the site's existing vegetation is located within the 2.1-acre HDZ area that will remain natural and undisturbed and will account toward the riparian habitat mitigation. Additional riparian habitat mitigation is located within the approximate 1.1-acre bufferyard and on-site retention and detention areas planned to meet RFCD standards.

Arizona Growing Smarter Acts are implemented on the site through public and private cooperation to efficiently develop and encourage the use of community infrastructure; and by providing a range of housing, employment and other essential services with safe environments to enjoy. The

development will provide single-family residential units and an essential health and a wellness service of independent living to our aging populations through the use of Well standards for buildings and lifestyles, utilize existing infrastructure and the applicant has negotiated private agreements for shared access and the installation of amenities (food truck and parking) which support public and private cooperation and investment along the Loop.

Concurrency of Infrastructure:

Concurrency of infrastructure exists to serve the proposed development:

CONCURRENCY CONSIDERATIONS		
<i>Department/Agency</i>	<i>Concurrency Considerations Met: Yes / No / NA</i>	<i>Other Comments</i>
TRANSPORTATION	Yes	No objection, subject to conditions
FLOOD CONTROL	Yes	No objection, subject to conditions
WASTEWATER	Yes	No objection, subject to conditions
PARKS AND RECREATION	Yes	No objection
WATER	Yes	Will-serve letter included in the SP
SCHOOLS	Yes	Letter of capacity included within the SP

TRANSPORTATION REPORT

The specific plan site is intended to be developed in two phases. Phase one will include the development of 200 independent senior living residential units located in the eastern 21 acres. The remaining western portion of the site, phase two, will retain 12 existing residences and will add 19 new residences, and will be subdivided.

Primary access for phase one is proposed through the existing Rillito River Park access onto Craycroft Road. The phase one access lies within Regional Flood Control District property. There is an existing access easement utilized by the adjacent residential lots to the east and north of the park. Access to phase one requires an easement to provide for legal access through the District's property. The applicant shall acquire any additional access easement with Flood Control District and/or Real Property Services.

Primary access for phase two will be provided through River House Road to Camino Blanco and ultimately to River Road. There will be no cross access between the phases for the public, but there will be a gated access between phase one and phase two for emergency response vehicles only. Traffic generated by the independent senior living facility will be completely distributed via Craycroft access, and traffic generated by the residential use will be completely distributed via Camino Blanco access.

Craycroft Road south of River Road is maintained by the City of Tucson, but the County maintains Craycroft Road north of River Road and its intersection. The applicant shall work with the City of Tucson for any traffic impact to their roadway system and any required off-site improvements.

Craycroft Road is a paved, four-lane divided roadway with 45 miles per hour (mph) posted speed limit. Craycroft Road is classified as an Urban Principal Arterial by its federal functional classification. A conservative 3% growth factor applied to the 2019 traffic counts on Craycroft Road indicates that 33,935 average daily trips (ADT) is expected at the project 2023 opening year. The approximate capacity for Craycroft Road is 35,820 ADT. Based on the most recent trip generation standards, phase one alone is expected to generate 442 ADT, and phase two 179 ADT. Based on expected traffic counts and capacity there are no Pima County concurrency concerns for Craycroft Road.

River Road is a paved two-lane roadway maintained by the County with the exception of a short segment east of Craycroft Road approximately 1,600 feet long, which is under the jurisdiction of the City of Tucson. River Road is an Urban Minor Arterial by its federal functional classification. River Road has a posted speed limit of 30 and 35 mph east and west of Craycroft Road. Based on the proposed trip distribution from the site to the roadway network in the preliminary traffic impact study, the site is expected to add approximately 290 ADT onto River Road west of Craycroft Road, and approximately 43 ADT will be added onto River Road to the east. The capacity of River Road is approximately 12,390 ADT and is currently operating over capacity. Traffic counts at the project 2023 opening year is expected to be 17,056 ADT east of Craycroft Road and 14,871 ADT to the west. There is a minor transportation concurrency concern on River Road given that the site trip generation will not significantly contribute to the over-capacity of River Road.

Camino Blanco and River House Road are local roads with posted speed limits of 25 mph. Camino Blanco is a paved, two-lane roadway maintained by the County with a 50 foot right-of-way width. River House Road is dirt road maintained by the County with a 60 foot right-of-way width. River House Road between Camino Blanco and Camino Blanco Place is required to be paved to Pima County standards. There are no available traffic counts for Camino Blanco nor for River House Road, but the approximate capacity of a two-lane roadway is 12,390 ADT. The development intensity in the vicinity of the site indicates that these roadways should be functioning well below capacity. The addition of phase two traffic will not have a negative impact on either of these roadways.

With the understanding that the specific plan site will be built in phases, an updated traffic impact study (TIS) shall be required with permit application submittal of each phase to evaluate current conditions at that time, projected site traffic impacts, and necessary mitigation for each phase of the development.

The concept plan for the western portion of the site (exhibit 11.A.2) indicates that Block 1, which includes 10 of the existing 12 residences, will have access from the west leg of the River House Road/Camino Blanco intersection. Block 1 will also have access within the internal private street system. Intersection improvements will be required to provide adequate access to Block 1 from the Camino Blanco/River House Road intersection. Any right-of-way dedication to improve the intersection shall be provided by the property owner. Internal circulation of the western portion shall be reviewed at the of tentative plat submittal and shall meet county standards.

The Department of Transportation has no objection to the request subject to rezoning conditions #4A-F.

FLOOD CONTROL REPORT

District staff has reviewed the Specific Plan, conducted a Water Resources Analysis, and offers the following comments;

1. There is a small area of FEMA Floodway that impacts the property and it was requested during an informal review to revise relevant exhibits to show the Floodway. The exhibits were not revised to show the FEMA Floodway that impacts the parcel. No improvements shall be within this area until a Conditional Letter of Map Revision (CLOMR) has been approved by FEMA. See capture below of the FEMA Floodway and the parcel line.



2. The site is located within mapped Regulated Riparian Habitat classified as Important Riparian Area with an underlying classification of Hydro-Mesoriparian Habitat (IRA H) and Hydro-Mesoriparian (Class H). The project proposes to mitigate impacts to the IRA H through on-site mitigation in 5 designated mitigation areas as shown on Exhibit II.F.2-1 and 2-2. These mitigation areas shall incorporate Low Impact Development Practices to augment the first flush retention requirement and irrigation.
3. Section H. Hydrology has been revised to state existing drainage infrastructure will be used to collect the 100-yr flows to outlet to the Rillito River. The applicant is aware no adverse impact to the Rillito River Bank protection or to the River Park Loop shall occur which includes increased flows over the Loop. Any modifications of these improvements will require a 408 Permit and a Facility Impact Permit.
4. Exhibit II.H.1 shows a structure located within the FEMA Special Flood Hazard Zone AE. The independent senior living community (Parcel A) is considered a critical facility and shall be regulated to the 500-year storm. The applicant has acknowledged on page II-3, II-26 and IV-20 the need to meet the 500-year storm requirements for critical facilities.
5. This site has an assured water supply by Tucson Water.
6. Rezoning condition #5E will ensure compliance with the Water Policies of the Comprehensive Plan.

Regional Flood Control District has no objection to the specific plan subject to rezoning conditions #5A-F.

WASTEWATER RECLAMATION REPORT

The rezoning area is within the Pima County Regional Wastewater Reclamation Department (PCRWRD) service area and is tributary to the Agua Nueva Water Reclamation Facility via the North Rillito Interceptor. Capacity for the proposed development is currently available in the 30" public sewer C-072, downstream from manhole 1712-08 (Type III P20WC00146, dated August 6,

2020).

Exhibit IV.A.4 Existing Easements – A 50-foot public sewer easement runs east-west along the length of the 30-inch sewer interceptor located along the northern edge of the property. The easement is shown only in the eastern portion of the property. No walls, fences or other structures are allowed within sewer easements. Written permission must be granted by PCRWRD for any structure constructed within public sewer easement.

PCRWRD has no objection to the proposed rezoning request subject to the addition of rezoning conditions #6A-F.

ENVIRONMENTAL PLANNING REPORT

Site Conservation Values

- The 34-acre project site is located partially within the Maeveen Marie Behan Conservation Lands System (CLS), with approximately 5.45 acres within the Biological Core Management Area (BCMA) designation and approximately 3.91 acres within the Important Riparian Area (IRA) designation.
- The site is within the Priority Conservation Area (PCA) for the Cactus ferruginous pygmy owl; it is outside the PCAs for the Western burrowing owl, Pima pineapple cactus, and Needle-spined pineapple cactus.
- There are 31 saguaros on-site; 9 are six feet or less; 22 are greater than 6 feet. Most are located in the northwest portion of the site.
- No washes appear to cross the site; however, mapped Hydro-Mesoriarian habitat covers the southeastern portion of the site and lines the boundary between Parcels A and B.
- The site was previously graded for agricultural purposes prior to 2002; much of the site appears devoid of native vegetation.

Landscape Context

The project site is located west of Craycroft Road and south of River Road at the base of the Catalina Foothills, where higher-intensity land uses along and south of River Road transition into the lower-intensity residential uses in the Foothills. The site is on the north bank of Rillito Creek adjacent to the Loop, Rillito River Park. To the north and west is a mix of low and medium density residential housing.

The project site is within the Rillito Creek/Tanque Verde Wash Riparian Wildlife Movement Area (AGFD 2013). The Rillito is a regionally significant wildlife corridor that connects protected habitat blocks in the Santa Catalina Mountains, Rincon Mountains, and Saguaro National Park East to the Santa Cruz River Riparian Movement Area, which in turn connects wildlife to multiple protected habitat blocks west, north and south of the Tucson area, including the Tucson Mountains, Saguaro National Park West, and Ironwood Forest National Monument.

Due to its proximity to Rillito Creek, the site likely facilitates some north-south wildlife movement between the Rillito and the Santa Catalina Mountains, which could be disrupted by this project. The additional riparian habitat to be created along the internal drainage may mitigate these impacts. Care should be taken when designing this new habitat to ensure it can facilitate some wildlife movement across the site.

Rillito Creek also provides habitat for a wide variety of native plants and wildlife. While the project site includes relatively little native vegetation, because of its proximity to the Rillito and the associated wildlife movement area it falls within the Priority Conservation Areas for several federally listed or at-risk species that, due to their vulnerable status, are included in the County's

Multi-Species Conservation Plan. These species include the Lowland leopard frog, Bell's vireo, Cactus ferruginous pygmy owl, Northern Mexican garter snake, Desert box turtle, and Giant spotted whiptail lizard.

Impacts to CLS and Biological Resources

According to the Specific Plan, approximately 5.29 acres of natural open space will be provided on-site. This includes 2.1 acres in the northwestern portion of Parcel A, which is outside the CLS but includes most of the inventoried saguaros and on-site native vegetation; these resources will remain undisturbed. Disturbances to riparian resources will be mitigated by protecting, restoring and enhancing approximately 3.19 acres of riparian habitat along the site's southern boundary, along the internal drainage running north/south through Parcel A, and in areas with existing riparian vegetation on Parcel B. Disturbances to IRAs and other riparian resources are regulated by the Regional Flood Control District according to the *Watercourse and Riparian Protection and Mitigation Requirements* of Pima County Code Title 16, where applicable.

The portion of the property within the BCMA designation of the CLS was previously graded for agricultural uses and there is little native habitat in this area. This disturbance occurred prior to the County's initial adoption of the CLS in 2002 so strict compliance with the CLS Guidelines for the BCMA designation will not be recommended as a condition of approval.

Because of its location within the Riparian Wildlife Movement Area, this project and the associated nighttime lighting and noise may indirectly impact its functionality as a wildlife corridor. Artificial lighting in particular can have significant impacts on a wide variety of wildlife, including birds, bats, reptiles and nocturnal mammals by altering or disrupting migration patterns and other critical life-sustaining behavior. Increased noise can have similar impacts. The planned restoration and enhancement of riparian vegetation along the southern boundary will minimize these impacts by buffering the Rillito from the development's indirect impacts. Other measures that can further minimize and mitigate these impacts are recommended below.

Recommendations

Consider measures that help facilitate wildlife movement when designing the riparian habitat planned along the on-site north/south drainage. For example, the specific plan indicates it will be bisected by a road, which may diminish its functionality. This can be mitigated by adding a culvert and/or a road median with multi-story native vegetation which would present a more contiguous corridor for wildlife moving across the site. Other measures to consider include widening the corridor as much as possible and minimizing adjacent high-intensity uses.

Site lower intensity uses such as parking areas or low-occupancy, daytime-use-only buildings adjacent to on-site and off-site riparian habitat to minimize indirect impacts. Use fully shielded, dark sky friendly fixtures for all outdoor lighting and limit the reach of lighting to only those areas needing illumination to prevent light from encroaching into riparian habitat.

CULTURAL RESOURCES REPORT

Cultural Resources has no objection to this request subject to the addition of condition #8.

NATURAL RESOURCES, PARKS AND RECREATION REPORT

Natural Resources, Parks and Recreation has no objection. Recreational opportunities have been afforded throughout the development.

UNITED STATES FISH AND WILDLIFE SERVICE REPORT

US Fish and Wildlife Service has no comment.

WATER DISTRICT REPORT

City of Tucson Water Department has no comment but has provided a will-serve letter contained within the Specific Plan.

SCHOOL DISTRICT REPORT

Tucson Unified School District has no comment but has provided a letter of capacity to serve the Specific Plan.

FIRE DISTRICT REPORT

Rural Metro Fire District has no objection to the rezoning. As of January 7, 2022, the 2018 International Fire Code has been adopted and will be the applicable fire code for this project. All plan submittals will go through the Fire District for approval and permit issuance.

IF THE DECISION IS MADE TO APPROVE THE SPECIFIC PLAN, THE FOLLOWING REQUIREMENTS SHOULD BE MADE CONDITIONS OF APPROVAL. THE FOLLOWING CONDITIONS MAY RESIDE WITHIN THE SPECIFIC PLAN DOCUMENT:

1. Not more than 60 days after the Board of Supervisors approves the specific plan, the owner(s) shall submit to the Planning Director the specific plan document, including the following conditions and any necessary revisions of the specific plan document reflecting the final actions of the Board of Supervisors, and the specific plan text and exhibits in an electronic and written format acceptable to the Planning Division.
2. In the event of a conflict between two or more requirements in this specific plan, or conflicts between the requirements of this specific plan and the Pima County Zoning Code, the specific plan shall apply. The specific plan does not regulate Building Codes.
3. This specific plan shall adhere to all applicable Pima County regulations that are not explicitly addressed within this specific plan. The specific plan's development regulations shall be interpreted to implement the specific plan or relevant Pima County regulations.
4. Transportation conditions:
 - A. Prior to development permit approval for the senior living facilities, any required access easement(s) within Regional Flood Control District property for the senior living facilities shall be obtained by the owner with the District and/or Real Property Service.
 - B. Prior to development permit approval for the senior living facilities, proof of coordination with the City of Tucson Transportation Department shall be provided to Pima County Development Services.
 - C. Cross-access between Phase 1 development (Senior Living Facilities) and Phase 2 development (Block 1 and 21 residential lots) shall be prohibited with the exception of providing emergency access only through a gated entrance. Any shared access easement between the developments shall be provided by the owner.
 - D. The property owner(s) shall accept responsibility for the maintenance, control, safety and liability of privately owned roads, drives, physical barriers, drainageways and drainage easements.
 - E. River House Road between Camino Blanco and Camino Blanco Place shall be paved to Pima County Standards and it is subject to Department of Transportation approval. Off-site improvements shall include intersection improvements for Block 1 access onto the Camino Blanco/River House Road intersection.
 - F. An updated Traffic Impact Study (TIS) shall be submitted for review and approval by the Department of Transportation with the submittal of each phase. Off-site improvements determined necessary as a result of the traffic impact study shall be provided by the property owner.
5. Flood Control District conditions:

- A. A 408 Permit and a Facilities Impact Permit is required for any modifications to the Rillito River Bank protection, the Loop or mitigated 404 vegetation on District property. Adequate detention/retention facilities shall be constructed on site to ensure that the Loop is not impacted by greater flood peaks, flood volumes, or flood frequency than current conditions.
 - B. The development shall meet the flood mitigation standards for a critical facility, including elevation.
 - C. Riparian mitigation shall be placed within drainage features and as a 50' buffer to the Loop.
 - D. First flush retention shall be provided in LID practices distributed throughout the site.
 - E. At the time of development the developer shall be required to select a combination of Water Conservation Measures from Table B such that the point total equals or exceeds 15 points and includes a combination of indoor and outdoor measures.
 - F. If the improvements are proposed within the effective FEMA Special Flood Hazard Area, both a CLOMR and LOMR are required. The CLOMR shall be approved by FEMA prior to District approval of the site construction permit.
6. Regional Wastewater Reclamation conditions:
- A. The owner(s) shall construe no action by Pima County as a commitment of capacity to serve any new development within the rezoning area until Pima County executes an agreement with the owner(s) to that effect.
 - B. The owner(s) shall obtain written documentation from the Pima County Regional Wastewater Reclamation Department (PCRWRD) that treatment and conveyance capacity is available for any new development within the rezoning area, no more than 90 days before submitting any tentative plat, development plan, preliminary sewer layout, sewer improvement plan, or request for building permit for review. Should treatment and/or conveyance capacity not be available at that time, the owner(s) shall enter into a written agreement addressing the option of funding, designing and constructing the necessary improvements to Pima County's public sewerage system at his or her sole expense or cooperatively with other affected parties. All such improvements shall be designed and constructed as directed by the PCRWRD.
 - C. The owner(s) shall time all new development within the rezoning area to coincide with the availability of treatment and conveyance capacity in the downstream public sewerage system.
 - D. The owner(s) shall connect all development within the rezoning area to Pima County's public sewer system at the location and in the manner specified by the PCRWRD in its capacity response letter and as specified by PCRWRD at the time of review of the tentative plat, development plan, preliminary sewer layout, sewer construction plan, or request for building permit.
 - E. The owner(s) shall fund, design and construct all off-site and on-site sewers necessary to serve the rezoning area, in the manner specified at the time of review of the tentative plat, development plan, preliminary sewer layout, sewer construction plan or request for building permit.
 - F. The owner(s) shall complete the construction of all necessary public and/or private sewerage facilities as required by all applicable agreements with Pima County, and all applicable regulations, including the Clean Water Act and those promulgated by ADEQ, before treatment and conveyance capacity in the downstream public sewerage system will be permanently committed for any new development within the rezoning area.
7. Environmental Planning condition: Upon the effective date of the Ordinance, the owner(s)/developer(s) shall have a continuing responsibility to remove buffelgrass (*Pennisetum ciliare*) from the property. Acceptable methods of removal include chemical treatment, physical removal, or other known effective means of removal. This obligation

- also transfers to any future owners of property within the rezoning site; and Pima County may enforce this rezoning condition against the property owner.
8. Cultural Resources condition: In the event that human remains, including human skeletal remains, cremations, and/or ceremonial objects and funerary objects are found during excavation or construction, ground disturbing activities must cease in the immediate vicinity of the discovery. State laws ARS 41-865 and ARS 41-844, require that the Arizona State Museum be notified of the discovery at (520) 621-4795 so that cultural groups who claim cultural or religious affinity to them can make appropriate arrangements for the repatriation and reburial of the remains. The human remains will be removed from the site by a professional archaeologist pending consultation and review by the Arizona State Museum and the concerned cultural groups.
 9. Adherence to the specific plan document as approved at the Board of Supervisor's public hearing.
 10. In the event the subject property is annexed, the property owner shall adhere to all applicable conditions, including, but not limited to, development conditions which require financial contributions to, or construction of infrastructure, including without limitation, transportation, flood control, or sewer facilities.
 11. The property owner shall execute the following disclaimer regarding the Private Property Rights Protection Act rights. "Property Owner acknowledges that neither the rezoning of the Property nor the conditions of rezoning give Property Owner any rights, claims or causes of action under the Private Property Rights Protection Act (Arizona Revised Statutes Title 12, chapter 8, article 2.1). To the extent that the rezoning or conditions of rezoning may be construed to give Property Owner any rights or claims under the Private Property Rights Protection Act, Property Owner hereby waives any and all such rights and/or claims pursuant to A.R.S. § 12-1134(l)."

Respectfully Submitted,



Terrill L. Tillman, AICP
Principal Planner



c: Lazarus & Silvyn, P.C., Attn: Keri Silvyn, 5983 E. Grant Rd., Ste. 290, Tucson, AZ 85712

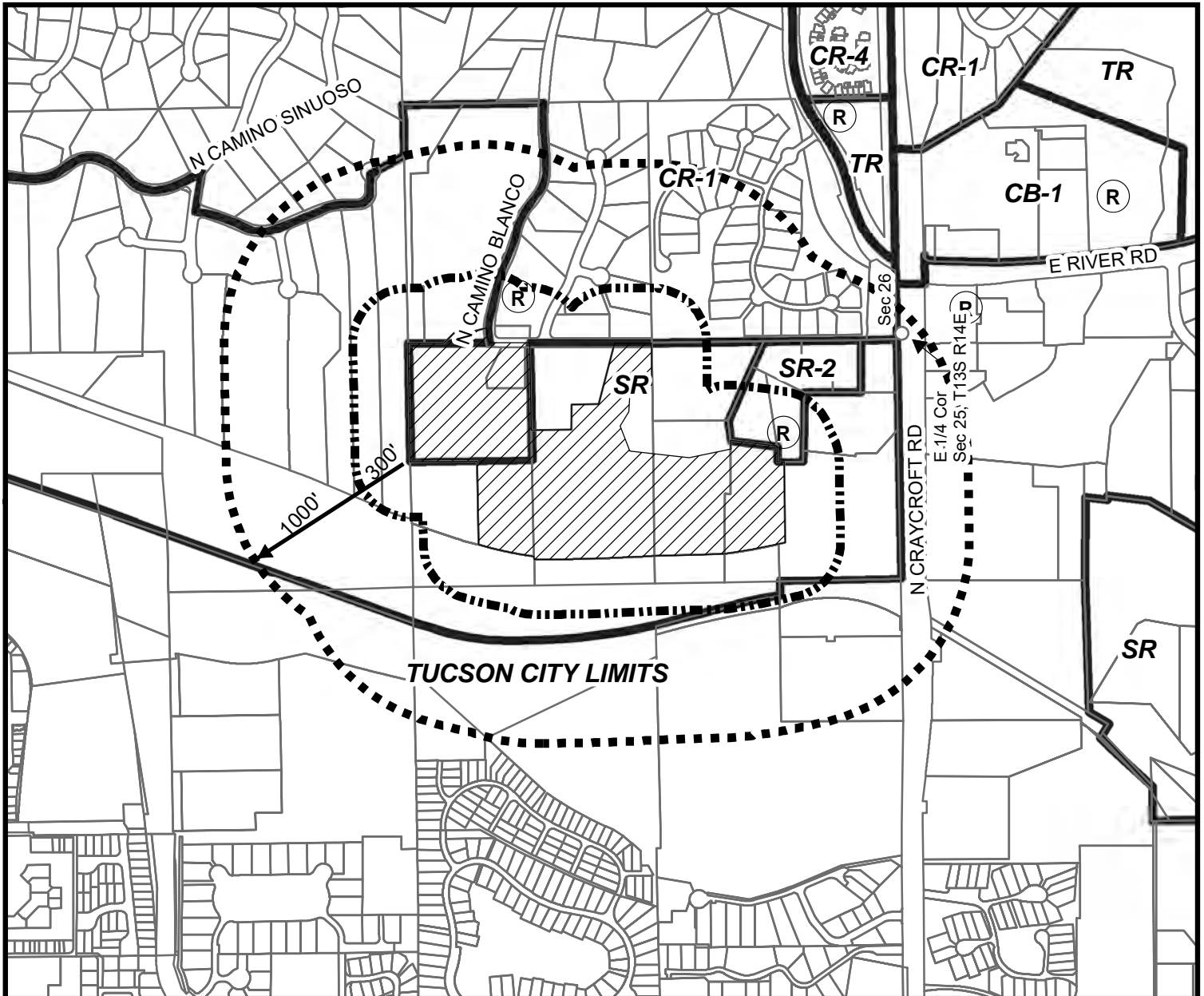
Case #: P20SP00002

Case Name: RIVER HOUSE TRUST, ET AL.-

N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

Tax Code(s): 109-26-003H, 005H, 005R & portions of 109-26-003D, 109-26-004D

 300' Notification Area  Subject Site  1000' Notification Area  Zoning Boundary



0 355 710 1,420 Feet

Area of proposed rezoning from SR & CR-1 to SP



**PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION**



Notes:

PIMA COUNTY COMPREHENSIVE PLAN CO7-13-10

Planning & Zoning Hearing: 1/26/22 (scheduled)

Board of Supervisors Hearing: TBD

Base Map(s): 25

Map Scale: 1:10,000

Map Date: 12/27/2021 - ds





Planned Development Community (PDC)

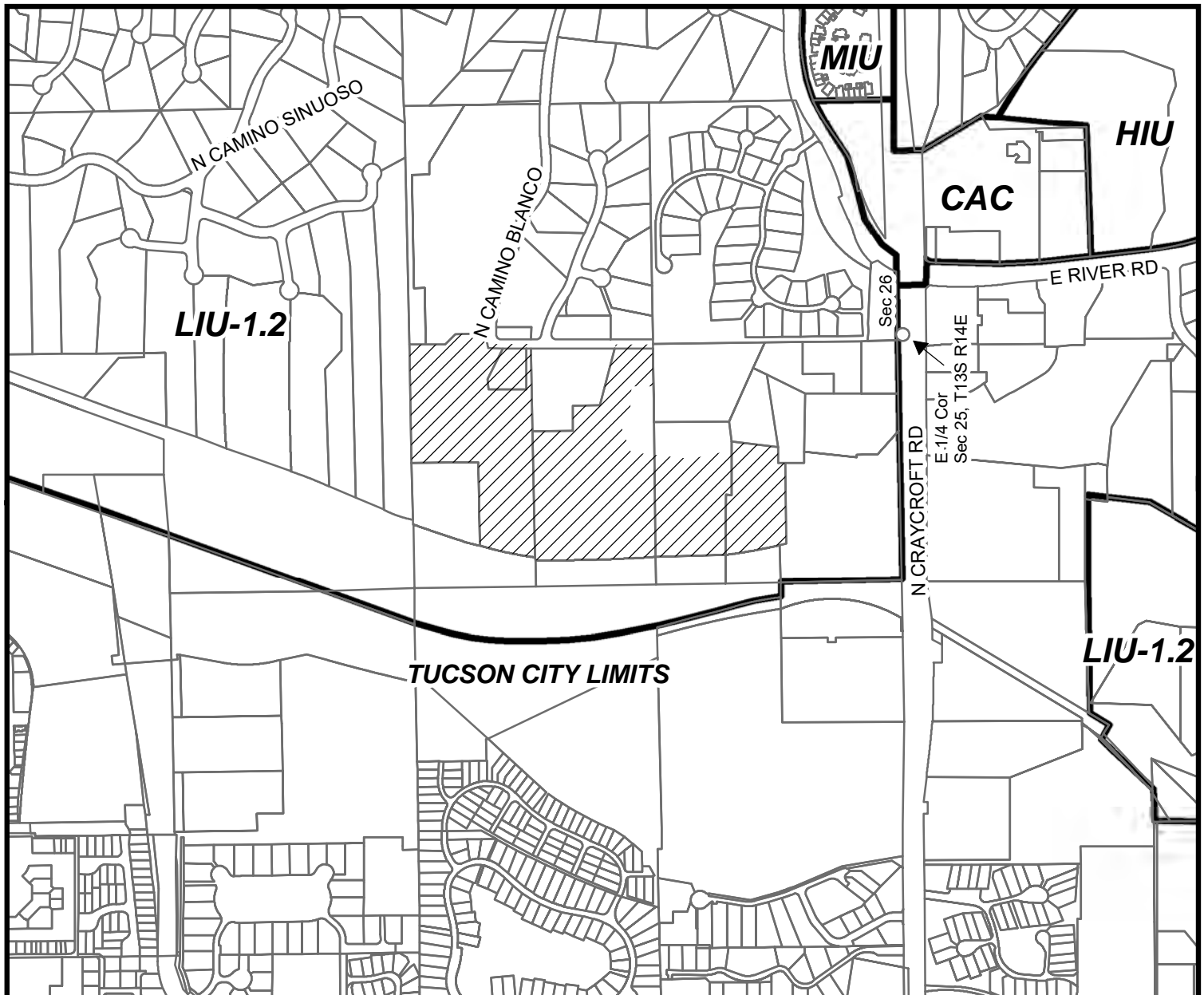
Objective: To designate existing approved specific plans. Specific plans comprise a unique zoning regimen within a planned community. Specific plan documents include detailed information on the intent for the community as a whole, as well as the individual planning and zoning districts within the specific plan area. Applications for amendments to individual specific plans shall be done in accordance with Section 18.90 (Specific Plans) of the Pima County Zoning Code.

Exception: State Trust land in the proposed Sahuarita East Conceptual Plan is designated a PDC under Special Area Policy S-36 in Chapter 9.

COMPREHENSIVE PLAN AMENDMENT

Planned Land Use

 Subject Site



Taxcodes:
109-26-003H,
109-26-005H,
109-26-005R,
and portions of
109-26-003D,
109-26-004D

P20SP00002 RIVER HOUSE TRUST, ET AL. - N. CRAYCROFT ROAD SPECIFIC PLAN & PLAN AMENDMENT

Request: Low Intensity Urban 1.2 (LIU-1.2)
to Planned Development Community (PDC)

Districts 1
Location:
Approximately
900 feet south
of E. River Road,
and 620 feet west
of N. Craycroft Road



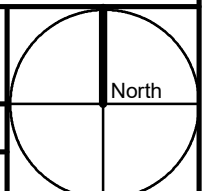
Catalina Planning Area under Pima Prospers
Section 26, Township 13 South, Range 14 East

Planning and Zoning Commission Hearing: January 26, 2022

Map Scale: 1:10,000

Board of Supervisors Hearing: TBA

Map Date: December 29, 2021 / dms



Endeavour Spirited Living Specific Plan

Neighborhood Meeting Summary

Note: *This neighborhood meeting was held both in person and online using a virtual meeting platform. There were 10 members of the public joining on the virtual format. Due to technical difficulties the night of the meeting, it was difficult for the online participants to hear portions of the presentation, particularly the questions being asked by in-person attendees. The Project Team recognized the issue, tried to repeat questions before answering, and apologized that evening as we understood the online participants' frustration. Some of the Project Team was also joining virtually. Through the WebEx platform's "chat" and "Q&A" functions, the Team offered to meet one-on-one with anyone who so desired. After the meeting, the Project Team sent an email to the online participants encouraging them to reach out if they would like to discuss the Project and/or ask any questions. In that email, we also indicated a copy of this meeting summary would be forwarded to them upon its completion. (This was done on Monday, January 17.)*

Project: Envisage Living Communities ("Envisage") and Mr. Pat Lopez (collectively, the "Owners"), propose to develop approximately 34 acres west of Craycroft Road and south of River Road (the "Property"), adjacent to the Loop trail system on the north side of the Rillito River. The Property is within unincorporated Pima County ("County") and currently zoned Suburban Ranch (SR) Single Residence Zone (CR-1). The Owners propose to rezone the Property to Specific Plan to support a mixed-use development that primarily features residential uses at varying densities with supporting uses and amenities (the "Project"). Concurrent with this Specific Plan proposal is a request to amend the Property's *Pima Prospers* land use designation from Low Intensity Urban – 1.2 (LIU-1.2) to Planned Development Community ("PDC"). The PDC designation is meant for properties planned as a community with unique features and designed within the context of its environment. For Parcel A only, there is a request for Board of Supervisor consideration to increase heights as stated in the Catalina Foothills Special Area Policy.

Date/Time: Tuesday, November 30, 2021
6:00 p.m.

Location: The Gregory School – 3231 N Craycroft Road
Virtual using WebEx platform

Meeting Invitation: The meeting invitation was extended to all property owners within 1000 feet of the Property via First-class Mail using a County-generated mailing list. (*See attached meeting invitation letter.*)

Attendance: Approximately 35-40 neighbors attended the meeting in person (several declined to add name to the Sign-In Sheet) and an additional 10 neighbors attended via WebEx. (*See Sign-In Sheet and Online Attendee List.*)

Project Team: The Project Team in attendance included:

- Phil Shapiro & Patrick Beach, Envisage Living Communities (Owner/Developer)
- Pat Lopez (Owner)
- Karen Cesare, Novak Environmental (Landscape Architect)
- Marcos Esparza, M Esparza Engineering (Traffic Engineer)
- Kevin Hall & Blake Junak, Cypress Civil Development (Civil Engineers)
- Keri Silvyn & Robin Large, Lazarus & Silvyn (Planning/Zoning Consultants)

Meeting Synopsis: Ms. Silvyn opened the meeting at 6:05 pm, apologizing for the technical difficulties. She welcomed both the in-person attendees and those joining online and introduced the Project Team. Ms. Silvyn then reviewed the agenda for the evening's presentation and provided instructions for asking questions to the online participants.

Ms. Silvyn oriented the attendees to the Property located south of River Road, west of Craycroft Road and north of the Rillito River. The Project consists of two distinct areas: Parcel A (east side of Property) includes approximately 21 acres, and Parcel B (west side of Property) includes approximately 13 acres¹. Ms. Silvyn then explained the context of the Property and its surroundings. The Property is significantly lower in elevation than adjacent properties and homes to the north and northeast. Parcel A is 50-70 feet lower in elevation than the properties and homes with several intervening hills/topography as buffers. In addition, there are two homes directly adjacent to Parcel A to the north and northwest that will be retained by the current owners to provide single-family residential buffers to the north. Parcel A is over 1800 feet from the nearest home to the south due to the separation by the Rillito River. The Chuck H. Huckelberry Loop (the "Loop") and County park trailhead are on the east, and to the west is Parcel B.

Adjacent to Parcel B on the west is an existing single-family residence ("SFR") that is owned by Mr. Lopez, and it will remain. There are also existing SFR rentals on the northern portion of Parcel B that are included within this Project and will remain. The nearest home to the south is over 1000 feet away across the Rillito.

Ms. Silvyn described the Project proposal, indicating that Parcel A will be developed as an age-restricted (55+) active adult community along with a public amenity and additional parking in the southeast corner that will be created for patrons of the Loop. Parcel B will be a SFR development.

Ms. Silvyn provided background information about Mr. Shapiro and Mr. Beach, the developers of Parcel A who have years of experience in active, senior and multi-family living. Ms. Silvyn explained the research showing Baby Boomers are aging, and they do not wish to age in the same way their parents have. They are interested in staying healthy, active and independent, and studies show that enhancing the quality of life as they age increases longevity. Envisage is proposing to develop a unique independent living

¹ There was some confusion as to how many acres was involved for Parcel B since the current owner of Parcel B also owns 3.3 acres adjacent. That acreage was clarified during the meeting as just over 13 acres that is proposed within the Project.

environment for healthy active adults with a target market of adults aged 70 and older that emphasizes successful, healthy aging and longevity in a small neighborhood setting. Studies also show aging adults want to be separated from assisted living and long-term care facilities, so these facilities are not part of Endeavour. Ms. Silvyn stated that 10,000 American turn 75 each day, and by 2030, all Baby Boomers will be 65 or older. Envisage intends to build a community for this generation that enables them to be more fit, more active and live longer.

Ms. Silvyn then described the reasons this Property is perfect for Endeavour and respectful of its surroundings. This is an infill property that is devoid of vegetation (due to historic agricultural uses) other than around its edges, and significantly more vegetation will be added as a result of this Project. The Property sits lower than its surroundings, includes natural buffer areas, and is adjacent to the Loop which is an amenity that will draw more users. The Property is also located near grocery, retail and healthcare facilities. Ms. Silvyn explained that this type of use is a lower traffic generator than both SFR and multi-family residential (“MFR”) uses, especially at peak times because of the age of the residents and the amenities offered to its residents onsite.

Ms. Silvyn then explained that Parcel B will include a more traditional residential development as a transition to the west of the active adult community, featuring single-family homes that may be rented or sold. Parcel B will be reconfigured to result in a total of 22 lots, which includes 12 existing residences and a proposal for 19 more homes. Vehicular access to Parcel B is separate from Endeavour.

Ms. Silvyn explained the two levels of planning and zoning in the County: the Comprehensive Plan (*Pima Prospers*) provides policy guidance and zoning provides the regulatory framework for development. Ms. Silvyn indicated that all zoning must be in conformance with the Comprehensive Plan. Currently, the Property is zoned a combination of Suburban Ranch (“SR”) and Single Residence Zone (“CR-1”). Both of these zones permit heights of 34 feet for buildings. The proposal is to rezone the Property to Specific Plan, which will allow for the unique use on Parcel A, the unique circumstance on Parcel B with its existing residential uses and the ability to develop a unique public amenity on the Loop. Ms. Silvyn then described the Comprehensive Plan amendment request, which will both change the Property’s land use designation from Low Intensity Urban 1.2 (“LIU-1.2”) to Planned Development Community (“PDC”) and will allow the heights on Parcel A as an exception to the Catalina Foothills Special Area Policy (which limits heights to 24 feet unless approved by the Board of Supervisors). These two requests (Comprehensive Plan amendment and rezoning) will run together.

Ms. Silvyn then presented the conceptual site plan for Parcel A (Endeavour), which includes approximately 21 acres, up to a maximum of 200 units in a combination of 2- and 3-story buildings. The 2-story residential buildings are 32 feet, the 3-story residential buildings are 45 feet, and the Quad (community center) building will be up to 36 feet in height.

Ms. Silvyn also described the buffers surrounding the Property, which includes a natural open space area where the topography is steep located at the north end of the Project. There is also a mesquite bosque in the north portion of the Property. From the top of bank along the Rillito to the southern Property line is

the 50-foot Rillito linear park. We are proposing to set back all buildings another 50 feet and re-establish riparian vegetation in that 50 feet. There will be a wrought-iron fence along the existing property line that will be designed to allow wildlife movement through the Property to the Rillito. To the east is the County's park, and the Project Team is working with the County to add approximately 30 parking spaces to the Loop area and the public amenity space affiliated with the restaurant on Parcel A. On the west side is Parcel B, and there will be a 25-foot landscape buffer between the parcels: 15 feet on Parcel A and 10 feet on Parcel B.

Ms. Silvyn explained that access to Parcel A is entirely from Craycroft Road. For safety reasons, we are required to have a second, emergency-only access into and out of the Property, which is located at the northwest corner adjacent to Parcel B. This access gate is controlled by emergency responders and will only be used in the event of an emergency and only if the Craycroft access is blocked. Ms. Silvyn also pointed out the existing access easement that serves the properties from Craycroft northeast of the Project, which will remain. The access drive from Craycroft will be expanded and improved.

Ms. Silvyn showed conceptual architectural renderings of Endeavour's proposed residential buildings, which feature "Desert Modern" architecture, high-quality materials and fenestrations. The Project architects have done a lot of research on local renowned architect, Judith Chaffee, who introduced widespread use of ramadas as an element of design to create shade. This has been incorporated into this Project's design. In addition, special screening strategies are being employed to enhance views of the rooftops from offsite locations by screening rooftop equipment. The screens will be an integral part of the building design. Ms. Silvyn also pointed out on the architectural renderings that each unit will have a single-car garage. Most residents will either have one vehicle or none at all. Endeavour is implementing an electric car share program for residents to encourage car-sharing.

Ms. Silvyn then described the vision for the Quad building, which is meant to have the look and feel of a community building found on a small college campus. The Quad will include a restaurant to serve the residents, fitness rooms, lecture halls, event space, cooking classes, a pool and other outdoor amenity space.

Ms. Silvyn described in more detail the access to Parcel A. She oriented attendees to the access location from Craycroft, which becomes divided to separate the existing access drive (which will remain for other property access) and the driveway to go to the Loop. The Project's driveway will come off of this south leg of the Loop driveway. The Project's Traffic Impact Analysis ("TIA") is available on the County's website along with the draft Specific Plan, or attendees may contact the Project Team if they would like to review a copy. The TIA is proposing a dedicated southbound 150-foot right-turn lane on Craycroft approaching the driveway. Ms. Silvyn also explained that the safety of pedestrians and bicyclists is a priority, so the idea is to separate them from vehicular traffic by limiting the access drive to vehicular traffic, and pedestrians/bicyclists will ultimately go under the bridge on the Loop to get to the other side of Craycroft. This will be constructed in the future separate from this Project. Also for safety purposes, the TIA proposes to limit movements from the access drive onto Craycroft to right-turns only, eliminating the currently unsafe left-hand turn onto Craycroft. The Project Team is working with both the County and

City Departments of Transportation to make improvements at the Gregory School traffic signal to allow drivers who turn right onto Craycroft to make a U-Turn at Gregory School and then drive north on Craycroft. Ms. Silvyn mentioned that the population of Endeavour—active senior living with no assisted living—will generally not drive during peak hours since they do not work or go to school. In addition, Endeavor is uniquely situated to be able to control deliveries and employee shift changes to occur outside of peak traffic times.

Ms. Silvyn then described the residential development proposed on Parcel B, which has the potential to add another 19 homes. The existing 12 homes on the Property will remain. Access for all of Parcel B will be on Camino Blanco. The TIA indicates that the 19 additional homes will add 14 more trips on Camino Blanco in the morning and 19 more trips in the afternoon, which is considered a very minor traffic increase based on existing traffic in the area. Ms. Silvyn reiterated that there will be no cross-access between Parcels A and B. Ms. Silvyn noted that the 50-foot vegetated buffer area along the Rillito River will be continued from Parcel A to Parcel B.

Ms. Silvyn described the proposed amenity along the Loop in the southeast corner of Parcel A. The County's bathrooms are currently on a septic system, and they will be connected to sewer as part of this Project. There will be a net of 30 additional parking spaces incorporated into the County's parking area for Loop access. Ms. Silvyn explained that the idea for the amenity space is to have an Airstream coffee bar and café tied to the food service in the Quad. It is not meant to attract people driving along Craycroft, but rather geared toward users of the Loop. Activating the space in an urban area also increases the safety along the Loop. Ms. Silvyn stated that the amenity area will also include some interpretive signage to acknowledge the history of the area related to farming and water resources for agricultural uses.

Ms. Silvyn concluded her presentation by describing the County's Comprehensive Plan amendment and rezoning process. This neighborhood meeting really kicks off the public outreach component of the process. The Planning & Zoning Commission public hearing is scheduled for Wednesday, January 26th. Anyone who directly received notification of this neighborhood meeting will also receive notice from the County regarding the public hearings. The Planning & Zoning Commission will make a recommendation to the Board of Supervisors, who will ultimately make a decision on the Project.

The second portion of the meeting was dedicated to answering questions and listening to comments. The following is a summary of the questions asked and responses from the Project Team:

Q&A

The majority of the questions and comments from participants were related to traffic, access on Camino Blanco and development of Parcel B.

Traffic/Camino Blanco Questions/Comments:

Q: The Project proposes 200 units, which will result in a very large increase in traffic at the Craycroft access drive. This is already an unsafe driveway, and the added traffic will make it worse.

Response: Ms. Silvyn explained that Endeavour's units are mostly 2 bedrooms with one 1-bedroom unit included in each of the 2-story 9-plex buildings. Most of the 2-bedroom units are double occupancy—mostly spouses (who often sleep in separate rooms as they age) and sometimes friends or siblings. Often single and couples are downsizing from larger homes and want the extra space.

Ms. Silvyn also explained that the population of Endeavour will still drive, but the use generates far fewer vehicle trips than a traditional apartment complex. The residents have their meals, personal services and amenities all onsite, so they do less driving to get these things—and they typically avoid peak/rush hours traffic. Even though each unit will have a single-car garage, many of the residents may not even have their own cars since Endeavour will have an electric vehicle car share program.

The TIA prepared for the Project proposes some improvements to the Craycroft access making the already unsafe and very busy driveway safer, especially for this population.

Q: Will Camino Blanco be improved as part of this Project?

Response: Ms. Silvyn explained that the amount of new traffic generated by the potential 19 new homes/lots is minimal. Our TIA analyzed Camino Blanco for the purpose of accommodating Parcel B development. The TIA shows an additional 14 trips during the morning peak hours and an additional 19 trips during afternoon/evening peak hours over current counts. Overall, there will only be an additional 179 trips per day, which is only a 4% increase. This small increase does not warrant improvements to Camino Blanco, which is a County-maintained roadway. As part of the project, Parcel B access will be paved from the end of the pavement along Camino Blanco to River House and into the Parcel B. Having additional residents using that roadway may add pressure to the County to better maintain. Ms. Silvyn also indicated that the construction of new homes on Parcel B will be required to pay roadway impact fees, which may be used for needed improvements.

Q: Who will control the emergency access/how will it be regulated? Given the age of the target population of Endeavour, we would expect the emergency access onto Camino Blanco to be used frequently.

Response: Ms. Silvyn explained that the emergency access gate is a requirement by the Rural Metro Fire Department and the County Department of Transportation in case the Craycroft access is blocked. Only emergency responders (i.e., fire, police and paramedics) will be able to access this gate. This does not mean that this gate will be accessed during *all* emergencies. In fact, the only time this will need to be accessed if the Craycroft access drive to the Project is blocked. Otherwise, emergency responders will get to Endeavour via Craycroft. Ms. Silvyn also pointed out that this emergency access option could also help the residents along Camino Blanco: if an

emergency occurs in the neighborhood, and Camino Blanco is blocked, emergency responders will be able to still get to the neighborhood via the Endeavour property.

Ms. Silvyn reiterated that this is an active adult community for independent living, not assisted living or long-term care. Statistics show that age-restricted communities without assisted living have no more frequent 911 calls than non-age-restricted communities. Because Endeavour focuses on wellness and health, the community will attract healthier seniors than those who reside in assisted living facilities.

Q: Will construction vehicles/equipment use Camino Blanco?

Response: Ms. Silvyn explained no Endeavour construction traffic will use Camino Blanco—construction vehicles will access the Endeavour property via Craycroft. In addition, all construction activities will be staged onsite, and the contractor will schedule certain activities around peak traffic times.

Ms. Silvyn then stated that the development of Parcel B will take place in the future—there is no set timeframe for its development. Construction on Parcel B will require access from Camino Blanco, and the Project Team will work with the County and neighbors to communicate when that construction will take place.

Parcel B Development Questions/Comments:

Q: Do you have renderings of the architecture proposed for Parcel B?

Response: Ms. Silvyn indicated that architectural renderings are not yet available for Parcel B. The development of Parcel B will occur at a later phase, so there are fewer details about this part of the Project.

Q: This is a big increase in density over what is there now. This will result in a big increase in traffic in the neighborhood and on Camino Blanco.

Response: As previously explained, the amount of new traffic generated by the potential 19 new homes/lots is minimal. We understand there are some concerns about the pavement maintenance on Camino Blanco and a particularly concerning curve. Camino Blanco is a County-maintained roadway. Our TIA analyzed Camino Blanco for the purpose of accommodating Parcel B development. The TIA shows an additional 14 trips during the morning peak hours and an additional 19 trips during afternoon/evening peak hours over current counts. Overall, there will only be an additional 179 trips per day, which is only a 4% increase.

Q: What is the development timeframe for Parcel B?

Response: Mr. Lopez explained that there is no development schedule for Parcel B. His intent is to get the zoning in place for development at some point in the future. Mr. Lopez indicated that after the recent loss of his wife, he decided to start this process to ensure entitlements are in place for his daughters who will inherit this Property. No builders have been identified to develop Parcel B, and it may not happen for some time.

Q: What is the estimated range in size for the homes on Parcel B? What is the price point for the homes on Parcel B?

Response: Ms. Silvyn explained that no homebuilder has been identified for Parcel B, so we don't know what size the homes will be or their price point. Ms. Silvyn indicated that the lots on Parcel B range in size from about 7,500 square feet to about ½ acre.

Other Questions/Comments:

Comment: The current owner removed trees and vegetation on the Property, unrelated to agricultural use.

Response: Ms. Silvyn replied that Envisage does not yet own the Property, which has been largely devoid of vegetation for many years. If any trees have been recently removed, that would be by the current Property owner, not our client.

Comment: The sewer is not controlled by the Property owner but by Pima County.

Response: Ms. Silvyn replied that is correct. The County controls the sewer system, and this Project will be required to make improvements to connect to the existing sewer infrastructure. Because of this, the County has asked that Envisage extend the sewer to the southeast corner of the Property so that the existing County park restrooms, which are currently on septic, may be connected.

Q: Parcel A and B seem unrelated. Why are they being presented together, and will they be voted on separately by the Board of Supervisors?

Response: Ms. Silvyn replied that Parcel A and Parcel B will, in fact, function separately, although we believe Parcel B will serve as an appropriate transition between the Endeavour Project and the existing lower-density residential uses in the neighborhood. Another reason they are being shown together in the Specific Plan proposal is because rezoning property to a Specific Plan allows property owners to deal with unique uses and/or unique circumstances. Parcel A involves a unique use and Parcel B involves unique circumstances, so proceeding together in one Specific Plan when these parcels are adjacent is logical and is done on other projects. Ms. Silvyn explained that because they are both within the Specific Plan, any decisions by the Board of Supervisors will be for both Projects—they will not be voted on separately. There is a possibility that the Planning & Zoning Commission and/or the Board of Supervisors may tie specific recommendations or conditions to one parcel or the other, but the overall recommendation/decision to approve will be for the entire Specific Plan.

Q: Has a hydrology study been conducted on the Property? Have you done traffic and environmental studies? Are they available for public review?

Response: Ms. Silvyn replied that the traffic impact analysis is included in the appendix of the Specific Plan. Preliminary hydrology and environmental studies have also been conducted, and the information is included in text of the Specific Plan, which is available on the County's Planning & Zoning Commission agenda website. If you would like us to send the information to you or

need help accessing the County's website, please contact one of our team members (contact info provided), and we will get the information to you.

Q: There is currently a lot of wildlife in this area. Won't this Project disrupt wildlife movement?

Response: Ms. Silvyn replied that wildlife in this area is "urbanized" and used to moving in and around homes. The Project Team has designed north/south corridors within the Project, including a drainage area within the middle of the site, to facilitate the movement of wildlife through the Property. (The Rillito River serves as the east/west corridor.) There will be wrought-iron fencing installed along the southern boundary adjacent to the Rillito River with openings wide enough to facilitate movement of smaller wildlife species. Wildlife currently moves through Parcel B, and corridors will be maintained through that portion of the Project as well.

Comment: The architecture you have shown on the 3-story buildings is not what I would consider "beautiful". It seems to have an industrial design.

Q: What outdoor amenities are being proposed on Parcel A?

Response: Karen, the Project's landscape architect replied that Endeavour will feature amenities, such as, but not limited to, a putting green, bocce ball, pickleball, swimming pool, a campus green/gathering space, a community garden, dog park and many walking trails internal to and throughout the community.

Q: What types of vegetation will you provide? Will you use reclaimed water and incorporate water harvesting into the Project?

Response: Karen replied that much of the Property is devoid of vegetation. The plan is to add an abundance of both native and riparian trees and vegetation to the Project. Trees will mostly consist of mesquites and palo verdes, but there may be some opportunities to plant hydriparian species, such as cottonwoods and other larger trees that historically grew on the Property. These hydriparian species are not low-water-use, so they would be used sparingly.

Karen explained that reclaimed water is available somewhere along the River Park, but we are not sure about the distance. If it is feasible to bring to the Property, we will use it. Water harvesting techniques will absolutely be incorporated into the Project.

Comment: You are destroying open space. Development belongs in the City. This is a rural area.

Response: Ms. Silvyn replied that this is actually an infill property, which already has access to existing infrastructure, including water, sewer and roadways. While the Property was historically used for agricultural purposes and has low-density SFRs, the surrounding area (River and Craycroft) has been developed over the years with higher density residential and higher intensity uses, such as schools, retail shopping centers, personal services and healthcare facilities. A benefit of this particular use is that it generates less traffic than a typical multi-family apartment complex. One of the County's goals is to increase density along the Loop to encourage its use, and this Project provides a unique opportunity to expand the Loop amenity with the Airstream coffee bar/café that will be serviced by the Project.

Comment: There are already too many retirement communities in the Tucson area, and they are not even full. We don't want another one here.

Comment: The Project is too dense. It will result in an increase in crime, noise and light.

Q: How many employees will be part of Endeavour? Will any of them live onsite? If this community is designed for people who do not need assisted living, why do you need staff?

Response: Ms. Silvyn responded that Endeavour estimates there will be 50 employees total with only about 20-30 on-site at any time. Endeavour will have a "country club" atmosphere where many amenities are provided onsite, including a restaurant, personal services, lectures and lessons, etc. Employees will be hired to organize and manage all of these activities, similar to a resort. Ms. Silvyn indicated that she does not know if any of the employees will live onsite or stay overnight, although it may be a possibility.

Q: Will the Project comply with the Dark Skies ordinance?

Response: Ms. Silvyn replied that both the City and County adopted a Dark Skies ordinance (called the City County Outdoor Lighting Code or "OLC") – one of the most stringent in the country – due to our astronomy in and near the University of Arizona. Part of the excitement of this area is the dark skies and the atmosphere, so both Parcel A and Parcel B developments will comply with the OLC.

Ms. Silvyn described some of the OLC's features, which include shielded lighting that is directed downward, a maximum number of lumens and no spill-over onto adjacent properties. Within Endeavour, the goal is to balance lighting and safety. The lighting will be kept low, possibly placing low bollards along paths throughout the community and in strategic areas that will provide safety around the building but still encourage wildlife to come through the Property.

Q: Will the Endeavour buildings have elevators?

Response: Ms. Silvyn replied that yes, all buildings within Endeavour will have elevators.

Q: What is the price point for the units in Endeavour?

Response: Ms. Silvyn replied that we are simply unable to answer that question at this time. A lot of the cost is going to ultimately depend on the cost of construction, which as we all know, has been fluctuating in recent months due to the pandemic and supply chain issues.

Q: Would you consider lowering the multi-story buildings to single-story?

Response: Ms. Silvyn replied that the multi-story buildings are key to getting the density needed on the Property to make a Project like this work. This particular Property was chosen because it sits 50+ feet lower in elevation than surrounding properties/homes to the north and northeast, so the buildings will have less of an impact on viewsheds. The Project is also adding extensive riparian vegetation particularly on the southern edge which will also act as a visual barrier. In addition, the County has identified areas along the Loop as being appropriate for increased density to take advantage of the amenity.

Q: Will there be access to the Loop on the west side of the development (Parcel B)? Will there be public access through the Project to the Loop? You are asking the neighborhood to take on a portion of the Project load by directing traffic on Camino Blanco; we would appreciate you giving the neighbors access to the Loop through your Project.

Response: Ms. Silvyn replied that there will be access for Parcel B to the Loop, but due to safety concerns for Endeavor, Parcel B and the neighborhood to the north, there is no proposed public access through the Property to the Loop. She explained that the Envisage team has had a negative experience with a similar situation on another Project because it is difficult to control access to ensure security of the Project. There is a private Loop access near the Quad building within Endeavour. The only public access to the Loop near the Property would be through the County park to the east.

Q: What is the estimated time for start of construction, and when will it be complete?

Response: Ms. Silvyn indicated that the goal to start construction on Endeavour is by the end of this year.

NOTE: There were some lengthy comments typed by online participants into the “chat” and “Q&A” functions in WebEx. Unfortunately, verbatim transcripts were not available after the meeting. Many of the comments were read aloud during the meeting, and later comments were summarized as they were repetitive of other statements made. Most of the comments have been captured under the Q&A portion of this neighborhood meeting summary. (Those not documented include statements such as “greedy developers” and “go away!”.)

The meeting concluded at approximately 8:15 p.m.

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80690

MISCELLANEOUS

P.D. Form B210-140
Rev. 7/16/58

Fee

150

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State of Arizona } ss
County of Pima }

I hereby certify that the within instrum
ment was filed for record at request
of **BOARD OF SUPERVISORS**

Date 1964 OCT 20

Book 2359 Page 228-229

Witness my hand and Official Seal
day and year above written.

ANNA SULLINGER, County Recorder

By *Bruce Stephens* Deputy

ORDINANCE NO. 1964-73

AMENDING AND CHANGING PIMA COUNTY ZONING MAP
NO. 25 IN THE VICINITY OF
STEVENS ROAD APPROXIMATELY ONE-HALF
MILE SOUTH OF RIVER ROAD

AS REFERRED TO IN PIMA COUNTY ORDINANCE NO.
1952-111 AND REPEALING ALL ORDINANCES AND PARTS
OF ORDINANCES IN CONFLICT HERewith.

BE IT ORDAINED BY THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA:

SECTION 1. That the Pima County Zoning Map No. 25

in the vicinity of Stevens Road south of River

Road approximately one-half mile east of Swan Road

as referred to in Pima County Ordinance No. 1952-111 be and the same is
hereby amended and changed to the zones as shown on the map entitled

"Amendment No. 11 by Ordinance No. 1964-73 to Pima County
Zoning Map No. 25" hereto attached and by reference
made a part hereto.

SECTION 2. That all ordinances and parts of ordinances in conflict
herewith be and the same are hereby repealed to the extent of such conflict.

PASSED AND ADOPTED by the Board of Supervisors of Pima County, Arizona,
this 20th day of October, 19 64.

APPROVED THIS 20th day of October, 19 64.

ATTEST
PIMA
COUNTY

Eileen D. Hanna
Clerk, Board of Supervisors

James J. Ray
Chairman, Board of Supervisors

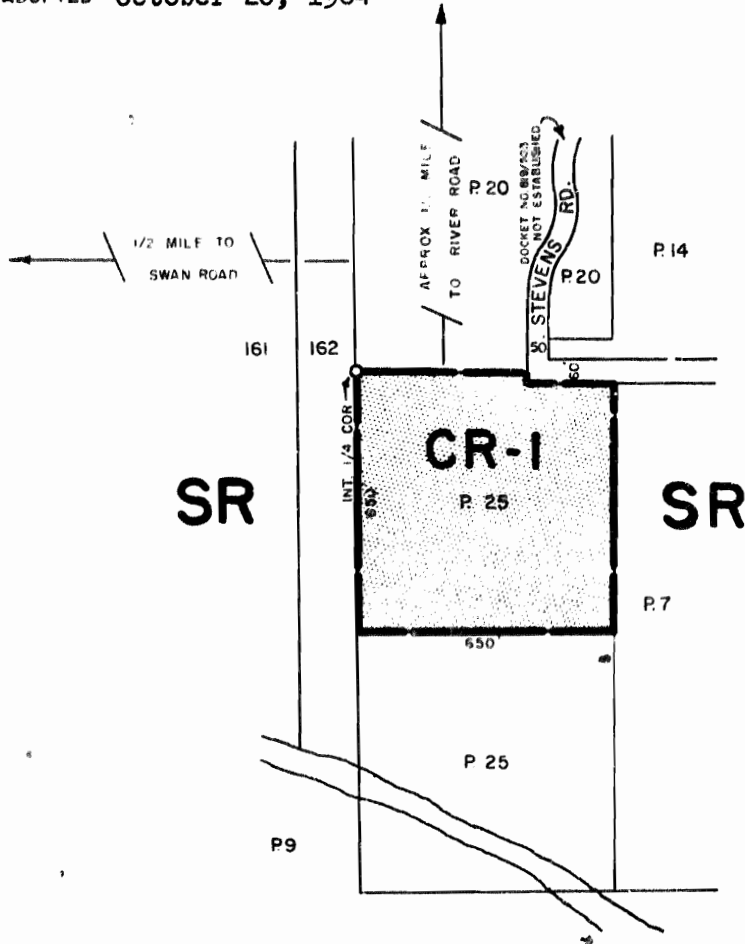
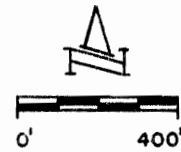
Approved as to form this 20th
day of October, 19 64

R. N. Sullinger
Special Deputy County Attorney

BOOK 2359 PAGE 228

146

AMENDMENT NO. 11 BY ORDINANCE NO. 1964-73
 TO COUNTY ZONE MAP NO. 25 TUCSON, ARIZONA
 PART OF P25, BEING PART OF THE N.W.1/4 OF THE NW.1/4 OF THE S.E.1/4 OF
 SEC. 26, T13S-R14E
 ADOPTED October 20, 1964



Wm S. Torgue
 EXEC. SEC'Y COUNTY PLANNING & ZONING COMM.

GBL. 10-24-64

C09-64-12
 C13-59-4

From: noreply@server.mailjol.net on behalf of [allForms](#)
To: [DSD Planning](#)
Subject: Application For Rezoning or Specific Plan
Date: Friday, December 18, 2020 3:33:10 PM
Attachments: [11545114.zip](#)

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Some files had been uploaded along with this submission. To download the files visit the link provided below. You will need to supply your AllForms login e-mail and password to download the files. We store all the uploaded files in zipped format, so you will need a unzipping program like WinZip to view or extract the files. Make sure you do a virus scan before trying to access these files on your system.

Download (<http://allforms.mailjol.net/file.php?id=6f6ae9da-11545114-8f773743>)

Form Results

Disregard	***>>> DISREGARD The message above the Form Results ROW <<<***
Note about attachments	***>>> Pima County virus software CYLANCE automatically scans files. There IS NOT a right mouse scan this file option. Attachments are scanned by our email appliance when received, then again by Cylance when saved or opened. Craycroft TR, Gregory Hutchison and Pamela Perry, River House TR and Pat Lopez III
Owner Name	
Owner Address	5983 E. Grant Rd., Ste. 290
Owner City	Tucson
Owner State	AZ
Owner Zipcode	85712
Owner Phone	520-207-4464
Owner_Email	KSilvyn@LSLawAZ.com
Applicant Name	Lazarus & Silvyn, P.C. (contact: Keri Silvyn & Robin Large)
Applicant Address	5983 E. Grant Rd., Ste. 290
Applicant City	Tucson
Applicant State	AZ
Applicant Zipcode	85712
Applicant Phone	520-207-4464
Applicant_Email	RLarge@LSLawAZ.com
Property Address	109-26-003H, 109-26-005H, 109-26-005R, and portions of
Property Parcel Number	109-26-003D and 109-26-004D
Property Acreage	34 acres

Property Present Zone	CR-1 and SR
Property Proposed Zone	Specific Plan
Policies	Catalina Foothills Subregion/Low-Intensity Urban 1.2/Special Area Policy S-2
FTP-Link	https://lsblandlaw.sharefile.com/d-s698422c9aee04d489490f2d47102e0a8
Signature	I confirm the information provided is true and accurate to the best of my knowledge. I am the owner of the above described property or have been authorized by the owner to make this application. (By checking the box, I am electronically signing this application.)
Application Date	18-Dec-2020
More Information about this submission and submitter	
Submission ID	11545114
Date & Time	18th Dec 2020 3:32 PM
Form Location	https://web1.pima.gov/
IP Address	69.137.181.209
Browser info	Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/87.0.4280.88 Safari/537.36
Predicted Country	--

December 16, 2020

Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Property Owner Authorization – Endeavour Specific Plan

Dear Development Services Staff:

Craycroft Trust owns approximately 3.78 acres located west of Craycroft Road on the north side of the Rillito Creek (the "Property") within unincorporated Pima County (the "County"), Assessor Parcel Number 109-26-003H. This Property is proposed to be included in the Endeavour Specific Plan (the "Project").

This letter authorizes Envisage Living Communities, Lazarus & Silvyn, P.C., Hord Coplan Macht, Novak Environmental, Inc., Cypress Civil, M. Esparza Engineering, LLC and their respective employees and other engaged consultants to take such action required to obtain all County zoning/development entitlements and related approvals for the Property, including, but not limited to, filing applications for the Project, tentative plat/development plan, grading permits and associated building permits.

Sincerely,

CRAYCROFT TRUST

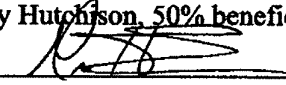
By: City Redevelopment, LLC, its Trustee and 50% beneficiary

By: _____

Name: _____

Title: _____

By: Gregory Hutchinson, 50% beneficiary

By:  _____

December 16, 2020

Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Property Owner Authorization – Endeavour Specific Plan

Dear Development Services Staff:

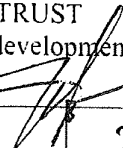
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This letter authorizes Envisage Living Communities, Lazarus & Silvyn, P.C., Hord Coplan Macht, Novak Environmental, Inc., Cypress Civil, M. Esparza Engineering, LLC and their respective employees and other engaged consultants to take such action required to obtain all County zoning/development entitlements and related approvals for the Property, including, but not limited to, filing applications for the Project, tentative plat/development plan, grading permits and associated building permits.

Sincerely,

CRAYCROFT TRUST

By: City Redevelopment, LLC, its Trustee and 50% beneficiary

By: 

Name: Tim Hutchison

Title: MMBR

By: Gregory Hutchison, 50% beneficiary

By: _____

December 16, 2020

Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Property Owner Authorization – Endeavour Specific Plan

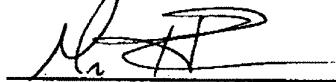
Dear Development Services Staff:

We own approximately 6.5 acres located west of Craycroft Road on the north side of the Rillito Creek (the "Property") within unincorporated Pima County (the "County"), Assessor Parcel Number 109-26-003D. A portion of this Property is proposed to be included in the Endeavour Specific Plan (the "Project").

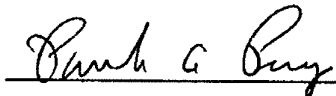
This letter authorizes Envisage Living Communities, Lazarus & Silvyn, P.C., Hord Coplan Macht, Novak Environmental, Inc., Cypress Civil, M. Esparza Engineering, LLC and their respective employees and other engaged consultants to take such action required to obtain all County zoning/development entitlements and related approvals for the Property, including, but not limited to, filing applications for the Project, tentative plat/development plan, grading permits and associated building permits.

Sincerely,

Gregory Hutchison & Pamela Ann Perry



Gregory Hutchison, a married man



Pamela Ann Perry, a married woman

December 16, 2020

Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Property Owner Authorization – Endeavour Specific Plan

Dear Development Services Staff:

River House Trust owns approximately 13.85 acres located west of Craycroft Road on the north side of the Rillito Creek (the "Property") within unincorporated Pima County (the "County"), Assessor Parcel Number 109-26-004D. A portion of the Property is proposed to be included in the Endeavour Specific Plan (the "Project").

This letter authorizes Envisage Living Communities, Lazarus & Silvyn, P.C., Hord Coplan Macht, Novak Environmental, Cypress Engineering, M. Esparza Engineering and their respective employees and other engaged consultants to take such action required to obtain all County zoning/development entitlements and related approvals for the Property, including, but not limited to, filing applications for the Project, tentative plat/development plan, grading permits and associated building permits.

Sincerely,

RIVER HOUSE TRUST

By: City Redevelopment, LLC, its Trustee and 50% beneficiary

By: _____

Name: _____

Title: _____

By: Gregory Hutchison, 50% beneficiary

By:  _____

December 16, 2020

Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Property Owner Authorization – Endeavour Specific Plan

Dear Development Services Staff:

River House Trust owns approximately 13.85 acres located west of Craycroft Road on the north side of the Rillito Creek (the "Property") within unincorporated Pima County (the "County"). Assessor Parcel Number 109-26-004D. A portion of the Property is proposed to be included in the Endeavour Specific Plan (the "Project").

This letter authorizes Envisage Living Communities, Lazarus & Silvyn, P.C., Hord Coplan Macht, Novak Environmental, Cypress Engineering, M. Esparza Engineering and their respective employees and other engaged consultants to take such action required to obtain all County zoning/development entitlements and related approvals for the Property, including, but not limited to, filing applications for the Project, tentative plat/development plan, grading permits and associated building permits.

Sincerely,

RIVER HOUSE TRUST

By: City Redevelopment, LLC, its Trustee and 50% beneficiary

By: 

Name: Tim Hutchison

Title: MMBR

By: Gregory Hutchison, 50% beneficiary

By: _____

January 11, 2022

Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

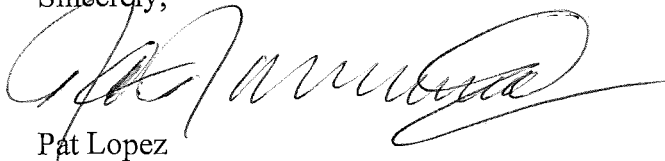
RE: Property Owner Authorization – Endeavour Spirited Living Specific Plan

Dear Development Services Staff:

I own approximately 16.5 acres located west of Craycroft Road on the north side of the Rillito Creek. Of this acreage, I am seeking to rezone and entitle approximately 13.2 acres (the "Property"), all of which is within unincorporated Pima County (the "County"). The Property is referred to by the street addresses of 5150, 5170 and 5180 E. River House Road and is comprised of County Assessor Parcel Numbers 109-26-005H and -005R. County Assessor Parcel Number 109-26-005Q is the 3.3 acres which I own that is excluded from the rezoning request.

This letter authorizes Envisage Living Communities, Lazarus & Silvyn, P.C., Hord Coplan Macht, Novak Environmental, Cypress Engineering, M. Esparza Engineering and their respective employees and other engaged consultants to take such action required to obtain all zoning/development entitlements and related approvals for the Property, including, but not limited to, filing applications for the Endeavour Spirited Living Specific Plan, tentative plat/development plan, grading permits and associated building permits.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pat Lopez', written over a horizontal line.

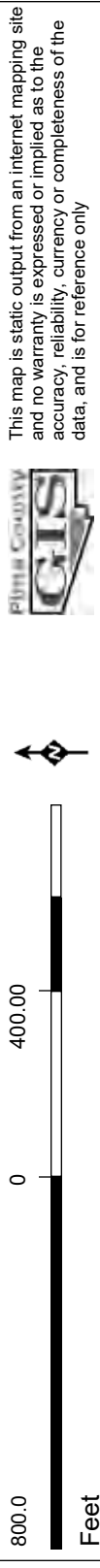
Pat Lopez

PimaMaps Print

Legend



Notes:



This map is static output from an internet mapping site and no warranty is expressed or implied as to the accuracy, reliability, currency or completeness of the data, and is for reference only



1/11/2022

From: [Tara McCall](#)
To: [DSD Planning](#)
Subject: Protest to rezoning of land
Date: Thursday, January 13, 2022 8:55:08 AM

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Let it be know that our neighborhood, and specifically our household:
3860 N Camino Blanco, Tucson, AZ 85718

are in strong opposition to the rezoning of parcels:
109-26-003H, 109-26-005H, 109-26-005R, and portions of parcels: 109-26-003D and 109-26-004D
from Low Intensity Urban 1.2 to Planned Development Community
and from Suburban Ranch and Single Residence zones to Specific Plan zone
southwest of E. River Road and N. Craycroft Road (section 26, township 13 S, Range 14 E in
Catalina Foothills)

We are **fully against the proposed rezoning** in every way possible now and in the future, and stand in solidarity with our neighbors who also oppose rezoning.

Thank you for your time and consideration,
Tara McCall

Dear Terri,

I am writing to urge you to reject the proposed rezoning of P20SP00002 RIVER HOUSE TRUST, ET AL. - N. Craycroft Rd. for mixed-use development.

As a resident, I can tell you that people move to this area because it affords a sense of place. The unencumbered views, native Sonoran Desert landscape, relative quiet, and abundant wildlife make for a high quality of life. These elements have both monetary and intrinsic value, and I am not alone in the belief that preserving them is a more intelligent, long-term strategy for keeping Tucson a livable city.

As an engineer, I can think of few worse places to build than the floodplain of an ephemeral wash where flooding, erosion, and runoff control are already issues. Concrete cover in this area will not only increase the intensity of runoff, but the quality of that runoff (from newly-paved roads, cars, and developments) will contribute to the degradation of both water AND sediment quality in the Rillito River. As to the impact of a project like this on microclimate: the concrete from such a development will raise average temperatures along the bank of the wash and make it harder for the large shade trees and other plant species that are supposed to constitute a 'bosque' community to grow.

I am asking that you consider encouraging the restoration of sensitive riparian areas rather than fall prey to the quick cash that 'development' will bring. Incentivizing population density in areas of the city where the desert environment IS ALREADY COMPROMISED, and furthering RESTORATION OF SENSITIVE RIPARIAN ECOSYSTEMS that could perhaps connect 'green spaces' will discourage urban sprawl and make for a smart, long-term strategy that will sustain the appeal of this place for generations to come.

Sincerely,
Orestes Morfin

A handwritten signature in black ink, appearing to read "Orestes Morfin", with a long horizontal flourish extending to the right.

Dear Pima County Planning Commission and Board of Supervisors:

I submitted some earlier comments on Case P20SP00002 after an admittedly incomplete reading of Pima Prospers. In particular, I paid attention to the Planned Land Use Map for the Catalina Foothills Planning Area, which shows the entire area of the proposed development, and nearly all other areas North of the Rillito as well, as LIU 1-2,. The reasons for this choice seemed, and still seem, compelling: “To designate areas for low-density residential and other compatible uses and to provide incentives for residential conservation subdivisions to provide more natural open space.” This, combined with the statement in Section 10.3 that “All rezoning requests and specific plans must demonstrate conformance to the Comprehensive Plan land use maps by law” apparently put the proposed development in conflict with the accepted regional development plans, and I so argued.

A helpful conversation with Terri Tillman of the Pima County Development Services, clarified that, in fact, it is a straightforward procedure to amend Pima Prospers to change the Planned Land Use Map, allowing dense urban developments that would not previously have been allowed. That is what the development proposal before you aims to do. The main justification for the proposed land use change appears to be its location in a Focused Development Investment Area around the Loop trail. The Specific Plan claims to comply with Policy 3.2.2.1 “Utilize infill development to strengthen existing neighborhoods...”. This development, however, is the antithesis of infill. It would expand into previously undeveloped semi-rural areas, rather than fill in gaps in existing housing.

As a resident of the Camino Blanco neighborhood, and a frequent cyclist on the Loop, I ask you to reject the proposed zoning change. I see the proposal as an incremental step toward the progressive urbanization of the corridor along the Rillito, and the wholesale rejection of the land use plan in Pima Prospers. This would have negative effects on all of us, and on wildlife, which is being increasingly crowded out of our world.

You, the Commissioners, are the only barrier against this detrimental change. I ask you to reject it.

Tim Axelrod and Roberta Allsman
3655 N Camino Blanco

We request that Case P20SP00002, RIVER HOUSE TRUST, ET AL.-
N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT be
disapproved on the following grounds:

1. **It does not meet the Pima County Development policies, as set out in the Pima Prospers and Chuck Huckelberry Loop Focused Development Investment Area documents**
2. **If implemented, it would have strongly negative impacts on the existing neighborhood near Camino Blanco, River House Road, and Camino Blanco Place**

1. Non-compliance with Pima County Development Policies

The Staff Report on this case, dated Jan 12, 2022, states:

“The plan adheres to Regional Plan Policies and is located within the Chuck Huckelberry Loop Focused Development Investment Area that encourages efficient infill growth.”

After examining the relevant documents, “Pima Prospers Comprehensive Plan Initiative”, dated May, 2015, and the Staff Report on the Chuck Huckelberry Loop Focused Development Investment Area, dated June, 2020, we find this statement to be unsupported.

- Section 10.3 of Pima Prospers, “Rezoning Process and Comprehensive Plan Compliance” states: “All rezoning requests and specific plans must demonstrate conformance to the Comprehensive Plan land use maps by law.”
- Section 10.4 further states “An applicant for rezoning may request any zoning district, except where noted, that conforms to the density requirements and the objectives of the particular land use category in which the property is located.”
- The land use map for the Catalina Foothills Planning Area in Pima Prospers shows the entire project area designated as LIU 1.2. **The proposed rezoning does not conform to this category of land use, and is therefore out of compliance with the requirements of Sections 10.3 and 10.4**
- The Chuck Huckelberry Loop Focused Development Investment Area (CHLFDIA in what follows) document lays out the specifics of what types of development are permitted in the area:

“The amendment lists permitted uses, which include some types of food and beverage service, basic retail and some services. The amendment provides requirements for permanent structures and establishments: setbacks and vehicle parking may be reduced but additional bicycle parking may be required, and floor area of structures is limited to ten-thousand square-feet in rural zones only. Uses would also include non-permanent businesses such as food trucks, mobile vendors, “pop-up” retail, kiosks and stands. Also, some temporary, portable signage along trails will be

Permitted.

Trail-oriented development will be permitted in the MU Multiple Use and CI-1 Light Industrial/Warehousing zones. MU zoning is found along the Rillito River stretch of the Loop in Flowing Wells and the Kleindale neighborhood at Alvernon and Fort Lowell, and the Loop passes through CI-1 zoning along the Julian Wash south of Tucson. The incentives allow uses in the CI-1 zone that are not generally otherwise permitted, and in the MU zone without an MU special use Permit.

Trail-oriented development will also be permitted in the RH Rural Homestead, GR-1 Rural Residential and SR Suburban Ranch rural zones under the Type I Conditional Use Permit process; the zoning code will also permit trail-oriented development in the SH Suburban Homestead zone through reference in the SR zone. There is rural zoning along the Oro Valley Loop branch, around Flowing Wells, and in the Binghamton Neighborhood area, as well as areas where there are plans to extend the Loop (Catalina, Green Valley, the county fairgrounds). The incentives allow uses in proximity to the trail through a single public hearing before the Hearing Administrator, who can modify, waive or condition certain development requirements. Most residentially zoned areas near the Loop are subdivided and developed, and were omitted from consideration; the uses are already permitted in commercial zones and were also not Considered.”

- **The proposed development of Parcel B does not meet the stated zoning requirements for CHLFDIA**
- **The proposed development of Parcel A is consistent with CHLFDIA only if one accepts that the presence of a trail amenity on a small corner of the parcel qualifies the entire 21 acres as a trail-oriented development. Parcel A as a whole is a residential development with no relationship to the Trail or value for its users.**

2. Negative Impact on an Existing Neighborhood

The existing neighborhood centered on Camino Blanco, River House Road, and Camino Blanco Place is zoned CR-1, with a minimum lot size of 0.83 acres. and SR, with a minimum lot size of 3.3 acres. It is rural in feel, with no street lights, a combination of paved and unpaved roads, and very little traffic on Camino Blanco, its only access road. We strongly value these qualities, which have persisted for decades.

The proposed developments of Parcel A and Parcel B will each have negative impacts on our neighborhood:

- The two and three story apartment blocks proposed for Parcel A are immediately adjacent to the SE boundary of our neighborhood. They would change the views in that direction, currently rural and dark at night, to densely urban with lighting for streets and 200 apartment units.

- The impact of the proposed development on the traffic on Camino Blanco from Parcel B will be strongly negative. The Staff Report on the proposal notes that "there are no available traffic counts for Camino Blanco nor for River House Road", but that "these roadways should be functioning well below capacity". Scaling from the current traffic level on Camino Blanco based on the number of new units in Parcel B, we find that the traffic counts passing in front of a typical address (3655 N. Camino Blanco) will increase by approximately 70%. The fact that this increased traffic level is "below capacity" for the road is small comfort to those of us who use the road for walking and biking, and value the quietness of our homes.
- The current traffic on Camino Blanco is already hazardous at times to pedestrians and cyclists. The road lacks sidewalks, is quite narrow in spots, and has one significant blind turn. The turn is posted at 15 mph, but this speed is routinely substantially exceeded. The increased traffic will increase the hazard.
- The traffic impact from Parcel A on Camino Blanco would also be negative. The plan specifies a gate access from Parcel B to be used for emergency access. Although the developers have asserted that this access would only be used when the Craycroft access to Parcel A is blocked, the conditional approval in the Staff Report specifies only that the access be limited to emergency traffic. An estimate of the rate of EMS calls averaged over a large population performed by EMSWorld suggests that the average number of calls per resident is 0.12 per year. The rate ranges from 0.05 to 0.28, with the higher rates presumably being for an elderly population such as that proposed for Parcel A. Assuming a rate of 0.25 and a population of 400, we would have 100 calls per year, a significant fraction of which can be expected to use Camino Blanco. EMS traffic will be substantially more hazardous to pedestrians and cyclists than the normal traffic flow.

Signed

Melissa Miller and David Sheldahl
3900 N. Camino Blanco

Daniel and Lillian Wong
3855 N Camino Blanco

Tim Axelrod and Roberta Allsman
3655 N Camino Blanco

Cody and Erika Coleman
3610 N Camino Blanco



Tim Axelrod
Roberta Allsman

Shane Dean
3612 N Camino Blanco Pl

Paul and Jenny Knappenberger
3622 N Camino Blanco Pl

Ann Slauter
3642 N. Camino Blanco Place

Joseph and Gretchen Mais
3645 N Camino Blanco Pl

Tom and Lisa Baumann
3700 N Camino Blanco Place

Chad Goebel and Michael Miller
3710 N. Camino Blanco Place

Jared Logue
3720 N Camino Blanco Place

Leigh Weisshaupt and Scott Bonar
3730 N. Camino Blanco Place

Ralph & Tina Eubanks
3735 N Camino Blanco Place

Jeff Capara and Carolyn Carbone
3740 N Camino Blanco Place

The property locations of the signatories are shown below



Case P20SP00002, River House Trust, Et Al - N. Craycroft Road Specific Plan and Comprehensive Plan Amendment

As part of the neighborhood to the North of parcels A and B, I am writing to express my opposition to the proposed rezoning and development of the property at Craycroft Road, "The Loop", and the adjoining Camino Blanco neighborhood. Current proposed rezoning of Parcel A invokes a radically inconsistent use of land within this residential and recreational area and will threaten the safety of drivers, residents, and the environment. An active adult community and numerous tightly set multi-family housing units do not fit into this CR 1 and SR single family neighborhood.

[Recommendations and Concessions follow below.]

My opposition to the currently proposed site plans is based on the following:

RE: CAMINO BLANCO ROAD

A. Camino Blanco Road is a poorly paved, curving, narrow 15-25 mph residential neighborhood street with no sidewalks or bike paths and is lined with houses. The Staff Report states:

"The capacity of River Road is approximately 12,390 ADT and is currently operating over capacity."

"There are no available traffic counts for Camino Blanco nor for River House Road, but the approximate capacity of a two-lane roadway is 12,390 ADT. The development intensity in the vicinity of the site indicates that these roadways should be functioning well below capacity."

It's questionable to consider River Road, described by the City of Tucson and ADOT as a "Scenic Arterial Street" and a "Minor Arterial Road" cushioned with bike paths and sidewalks, equal to, in safety and capacity, Camino Blanco Road or River House Road. Based on the engineers assertion, traffic on Camino Blanco Road will increase by only 4% when accounting for additional trips due to Parcel A emergency vehicles and Parcel B residents. As a percentage of an extremely unrealistic 12,390 ADT capacity on this tiny side street, that may be true.

However, a more reasonable traffic analysis for Camino Blanco Road, South of Unity Church, would predict an increase of the existing traffic burden by around 70%*.**

According to the traffic report, 19 new units will generate 179 additional daily trips on Camino Blanco. At the rate of 9.42 trips per unit, the existing neighborhood south of my location (3610 N Camino Blanco) generates 245 daily trips (26 existing homes x 9.42 ADT). As a percentage, the new units will impose a 73% increase in neighborhood traffic on Camino Blanco Road. This calculation excludes the Unity Church (3617 N*

Camino Blanco) intermittent event traffic that would dilute traffic numbers when collected at the intersection of River Road and Camino Blanco Road, as church visitors do not drive South past the church and into the neighborhood. Camino Blanco Road between River and Unity Church is straight, wide, and flat. South of Unity Church is where the road becomes narrow, windy, and steep with poor visibility.

B. Traffic safety: The provision of access for emergency vehicles shall include appropriate methods to minimize the endangerment of passing vehicles. Camino Blanco is a narrow, winding street in a neighborhood with no roadway amenities. There are blind corners where run-ins with delivery drivers, waste disposal trucks, and other homeowners occur daily and one must swerve or brake abruptly to avoid collision.

1) It's impossible to say how many accidents occur yearly on a road when most of the accidents only affect the swerving driver, and thus, are not reported to officials. On 2 occasions, my spouse and I have come to the aid of drivers who had avoided a head-on collision with oncoming traffic by driving off the East side of Camino Blanco Road, their vehicles subsequently becoming wedged in the embankment atop a steep drop off down a hill. Those vehicles were towed out later. We have seen countless tire tread marks leaving the road and heading for the hillside on our evening walks with our dogs.

RE: PARCEL A

A. Residents of our neighborhood have been informed that Parcel A will include an “emergency access” on the west side of the compound.

1) If the zoning and plans are approved, we would like a guarantee that ONLY emergency vehicles will utilize Camino Blanco Road to access Parcel A, and ONLY if and when the main entrance to Parcel A is completely blocked. Our prediction is that this good faith promise of using our residential road when absolutely necessary for emergencies will shortly morph into landscapers, food delivery semi-trucks, Endeavor employees, construction workers and equipment, and other maintenance workers utilizing Camino Blanco for their benefit to access Parcel A.

B. There are several homes in this neighborhood that draw 100% of their potable water from a well on the property. There is a concern that the diversion of water pertaining to both Parcels A and B may affect the water table levels and accessibility or the safety of drinking water for those nearby residences. ***There is no mention of the current-use neighborhood wells in the Specific Plan Report nor the Staff Report.***

RE: PARCEL B

A. The arbitrary Spot Zoning of Parcel B from CR-1 and SR to the “Specific Plan” zone should be **DENIED**. Parcel B is entirely encircled by SR and CR-1 single family residences averaging 3,286 square feet in size and with a median value of \$755,000 (+/-, via Zillow ‘Sold for’ and ‘Zestimates’). Adding 19 tightly packed mini residences on

lots as small as 0.17 acres, that may be either sold or rented, is a threat to the safety and value of this serene community.

Without plans regarding the future building structures or intentions on Parcel B, it is difficult not to assume the worst case scenario - that we may be bridled with multiple short term rental units next door. This would certainly cause a decrease in the surrounding property values of this proposed multi-family housing rental unit.

1) On Camino Blanco Road, there exists a VRBO (Vacation Rental By Owner) rental home that frequently generates noise complaints and causes traffic issues with parking and unfamiliar drivers utilizing Camino Blanco Road. We can only presume that Parcel B will take advantage of lucrative short term rental opportunities such as Airbnb and VRBO. 19 possible short term rental units would carry with them dozens+ of renters each month who will be unfamiliar with this area and the intricacies of navigating Camino Blanco. Again, this would raise concerns regarding the safety of cyclists, pedestrians, and other drivers who utilize Camino Blanco Road daily.

a) Crime increases often coincide with short term rentals and unrented empty buildings. We have witnessed customers of the existing VRBO property on Camino Blanco Road trespassing and entering into empty homes and pools while owners are away. There are police reports concerning several properties to back this up. If the owner of Parcel B is permitted to employ a possible 19 short term rentals, that would essentially create a commercial motel within this residential neighborhood.

B. Building 19 units within this neighborhood on lots as small as 0.17 acres creates a system for overcrowding and loss of nearby property values due to the down-zoning that would result. The Parcel B proposal indicates the new units are designed with an allotment of 2 parking spaces per unit, which suggests the landowners believe these dwellings will house couples and, potentially, their families. This brings up concerns of overcrowding both within the new units and on Camino Blanco Road and River House Road.

C. There are several homes in this neighborhood that draw 100% of their potable water from a well on the property. There is a concern that the diversion of water pertaining to both Parcels A and B may affect the water table levels and accessibility or the safety of drinking water for those nearby residences. ***There is no mention of the current-use neighborhood wells in the Specific Plan Report nor the Staff Report.***

RECOMMENDATIONS AND CONCESSIONS

- Recommend that the currently coupled rezoning request for Parcels A and B be **DENIED**
- Recommend that Parcel A be dislodged from Parcel B

- Recommend that the proposed Spot Zoning of Parcel B be **DENIED**
- Recommend Parcel B remains or rezones to a CR 1 classification with the option to add 4 additional income units. This will adhere to an overall rate of 1 single family residence per 0.83 acres, totaling 16 rental units (including the current 12 rentals.) This alteration would retain the open space inherent to this neighborhood, greatly reduce the impact on Camino Blanco Road and River House Road traffic, and result in a continued and enlarged income stream for the landowner.
- Recommend the developers investigate water diversion effects on existing wells in the area before Pima County approves the development
- Recommend an easement remain on Parcel B to provide access to the Emergency Exit on Parcel A
- Recommend Parcel A developers study the layout of Camino Blanco Road, have the road widened and straightened at its blind curves, and put into place future regular roadside vegetative maintenance to improve visibility along the route and enhance safety for emergency vehicles and residents
- Recommend Pima County Transportation Department impose a substantial fee on Endeavor Spirited Living and any future and subsequent owner of Parcel A each time Camino Blanco Road is used for its benefit outside of a documented emergency in perpetuity

Signed,

Erika and Cody Coleman
3610 N Camino Blanco

From: [Susan Antrim](#)
To: [DSD Planning](#)
Subject: Endeavour Spirited Living Project
Date: Friday, January 21, 2022 9:19:08 AM

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

I object to Endeavour Spirited Living Project. This will not be an enhancement to the area but will cause more traffic, noise and disruptions.

Thank you

Susan Antrim/Jim Ragan
3695 N Camino Rio Soleado
Tucson, AZ 85718
520-548-6255

Re: Case P20SP00002, RIVER HOUSE TRUST, ET AL.-
N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

We are writing to strongly oppose the disruptive transformation of the land proposed by this proposal for rezoning from Low Intensity Urban 1.2 (LIU-1.2) to two high density developments.

We were shocked to learn a few weeks ago about the vast changes proposed for the development area. The proposal is an abandonment of the character of the neighboring properties, and is completely dismissive of the immense impact these changes will inflict on the natural environment. This plan will fundamentally transform access to the Rillito wash for numerous species.

The project plans for both Parcel A and B would significantly degrade wildlife connectivity that have been recorded and mapped as riparian corridors in the area. We've included imagery comparing the two parcels division plans in relationship to a regulated riparian corridor identified by the county that runs directly through our property as well as the entire community. These visuals can be found on Addendum A, B and C to this letter. We believe it is important for Pima County's planning and development to balance the commercial and residential needs of people with the preservation and respect for the biological diversity of our desert. This plan is a long way from that.

We understand the desire for the County to develop near the loop, especially where it intersects major roads. However, densely developing the entirety of the loop is a terrible idea. The animals that have traveled along pathways to reach the Rillito long before people lived there should not be cut off from that access by development. And they should not have their access dependent of their willingness to crawl through culverts and narrow passageways, or between walls and halogen-soaked corridors, or to have the paths they are intimately familiar with replaced by paved curated paths and man-made gardens.

With the significant increase in population over what the area is currently zoned for, it is also likely that we could expect increased conflict between pets and wildlife traversing the wildlife corridor to the wash, which will lead to tragic outcomes for wild bobcats, coyotes, snakes and other native desert dwellers. The increased traffic in our neighborhood will be further detrimental to wildlife that can regularly be seen trotting down the dirt roads.

We do not oppose any and all development and we recognize that the region is growing, and that the owners of these parcels can, and should, be allowed to develop their property. However, we believe that development needs to be consistent with the community that the property is a part of and needs to meaningfully respect a right of way for the many animals that currently utilize this corridor as they have for generations.

While we do not currently have an official and comprehensive list of the fauna that utilize this corridor, we have compiled—with the help of a dear friend and wildlife photographer who

currently resides with us—a list of those animals we have seen repeatedly utilizing the natural riparian corridor impacted by this proposed plan. You can find this list in addendum D.

We believe this area could be meaningfully and profitably developed without the need to obliterate the current zoning status of the land. A plan that constructs properties which closely model the lot sizes of other residences to the north and west of the property could be accomplished without completely disrupting the diverse flora and fauna of the area and without destroying the character of the community.

Lastly, while our letter and attached documentation focuses on our grave concerns for area wildlife, we also wholeheartedly agree with our neighbor's comments *in opposition* to this proposal. We signed an additional comment letter that articulates the neighboring communities' concerns about traffic safety for residents on our no outlet/partially dirt access road to our property. In mornings and evenings in our neighborhood there is almost always someone out walking on the quiet (sidewalk-less) roads enjoying the peace of the neighborhood.

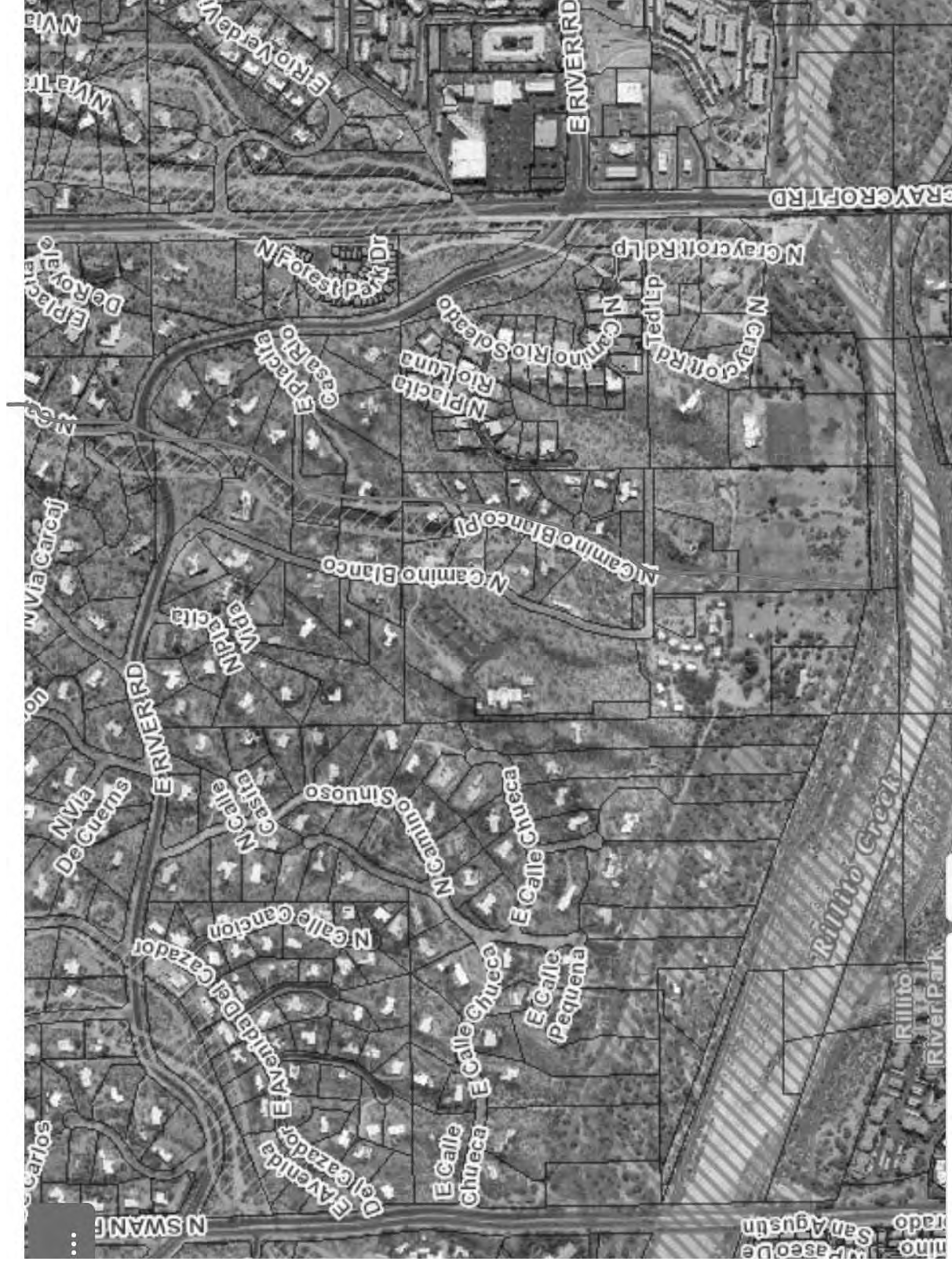
We also wholeheartedly agree with our neighbors to the south and west, Erika and Cody Coleman stating "There is a concern that the diversion of water pertaining to both Parcels A and B may affect the water table levels and accessibility or the safety of drinking water for those nearby residences. There is no mention of the current-use neighborhood wells in the Specific Plan Report nor the Staff Report". We are dependent on well water as our only potable source of water and are seeking assurance the county has assessed impacts by both of these development plans on the future of water resources our family depends on.

For all of these reasons, we strongly oppose the current planned use of this property and urge the commission NOT to recommend approval of this rezoning proposal to the Board of Supervisors.

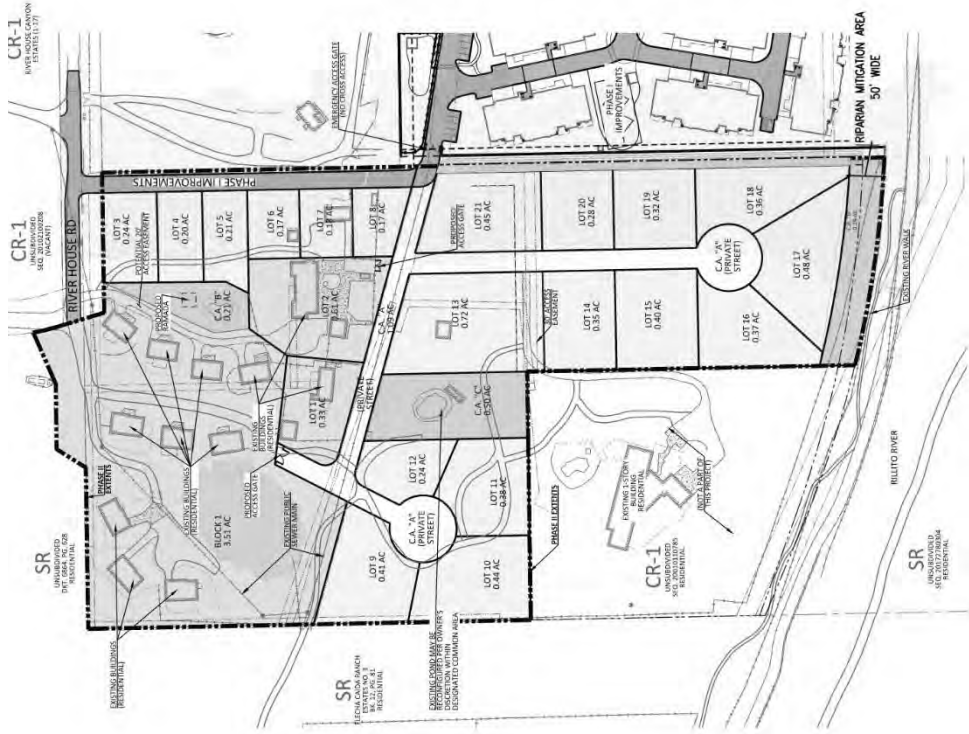
Thank you for your time,

Gretchen & Joseph Mais
3645 N. Camino Blanco Pl.

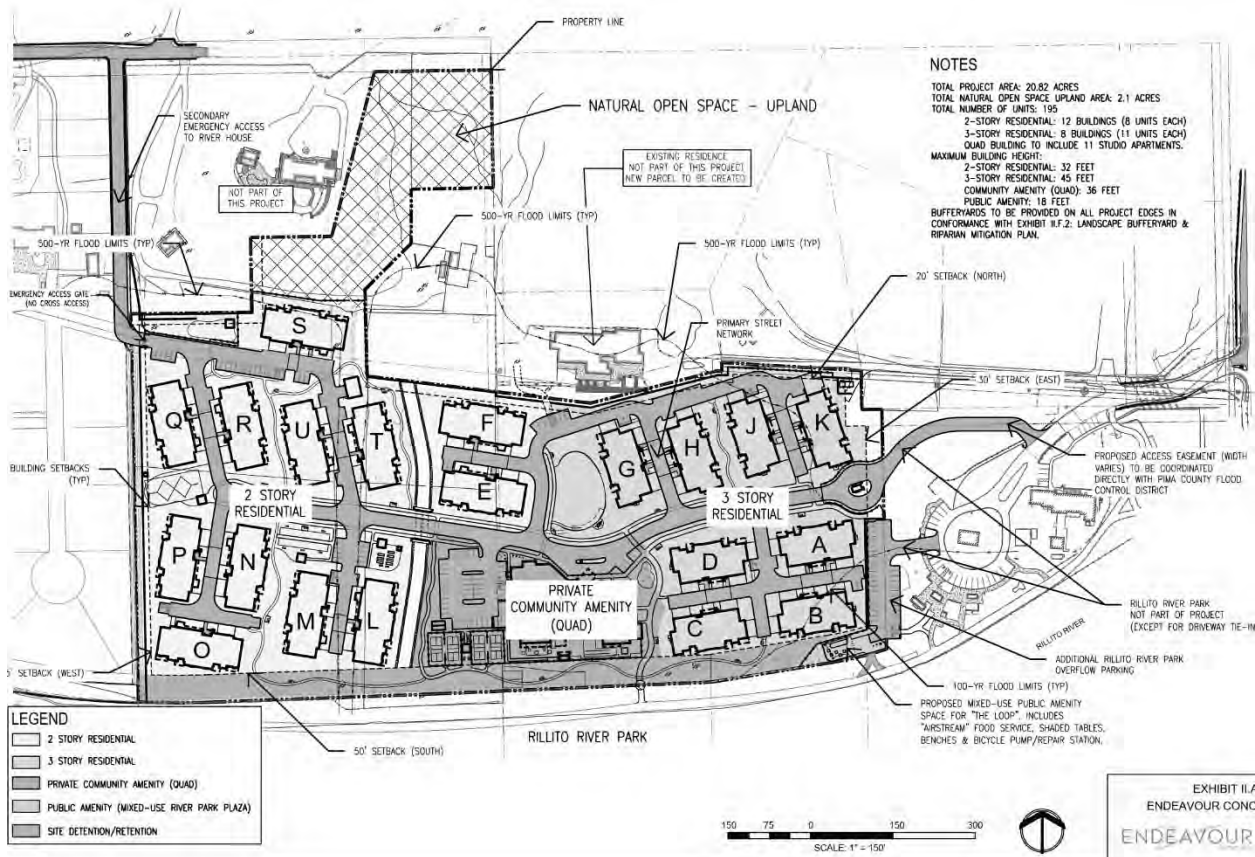
Addendum A: Map showing regulated riparian habitat (green slashed). The riparian habitat along the red line (which we added) is the only regulated riparian habitat connecting North of River Road to the Rillito that is completely *between* the incredibly busy Swan and Craycroft roads. In other words, this is the **least trafficked and least light and noise polluted route between two major thoroughfares to the Rillito river.**



Addendum B: The image on the left shows the project plans where Parcel A abuts Parcel B. Note that the small quarter-acre lots in Parcel B will likely be almost wholly covered by the foot print of newly constructed homes. And on Parcel A, you can see three multi-story residences are planned to be built right up to the property boundary leaving absolutely zero space for wildlife to traverse to the Rillito along the county's identified riparian habitat. In addition, a 6-foot wall is planned between the two parcels – further degrading what is currently open, vegetated landscape. Furthermore, it seems likely that within the tight row of 10 quarter-acre lots on the Parcel B that are within the riparian habitat – each resident will want to wall off their own lot for privacy from proximal neighbors. **The result is that this riparian through-way for wildlife will be wholly, completely and irrevocably blocked.** (We have highlighted the recognized riparian area in yellow below).



Addendum C: The eastern portion of Parcel A also significantly infringes on riparian habitat. The red on the arial map below shows where the overflow parking lot would be and the blue shows where four three story buildings (A, B, C and D) will be built. Overall the only riparian corridor that won't be paved over is a 50 foot buffer between the bike path and the property, which is nice but also obviously more an aesthetic choice for the benefit and privacy of future residents than a functional space to facilitate movement of wild creatures.



Addendum D: A non-comprehensive list of fauna that have been seen repeatedly or regularly utilizing this particular riparian corridor connecting to the greater Rillito Wash corridor include:

- Bobcat
- Desert cottontail
- Jackrabbit
- Roadrunner
- Peccary
- Collared lizard
- Sonoran toad
- Coyote
- Tarantula
- Several species of scorpion
- Western Diamondback rattlesnake
- Mohave rattlesnake
- Coachwhip snake
- Long-nosed bat
- American kestrel
- Cooper's hawk
- Harris's hawk
- Turkey vulture
- Great horned owl
- Western screech owl
- Northern cardinal
- Gambel's quail
- Gila woodpecker
- Northern flicker
- Ladder-backed woodpecker
- Brown-crested flycatcher
- Vermillion flycatcher
- Curve-billed thrasher
- Cactus wren
- Canyon wren
- Verdin
- Mourning dove
- Western kingbird
- House sparrow
- House finch
- Lesser Goldfinch
- Anna's hummingbird
- Costa's hummingbird
- Broad-billed hummingbird

January 21, 2022

Pima County
Development Services Department
201 N Stone Ave
Tucson, AZ, 85701

Case P20SP00002, River House Trust, Et Al - N. Craycroft Road Specific Plan and Comprehensive Plan Amendment

We are writing to express opposition to the proposed rezoning and development of the property at Craycroft Road, "The Loop", and the adjoining Camino Blanco neighborhood.

We have lived in this neighborhood for over 20 years, and feel that the changes proposed would drastically change the feel and the attraction of the Tucson Foothills area. In that time the county has changed zoning to allow high density apartments and commercial development in the area of Craycroft and River. We understand that progress is inevitable and that is fine for what has already been added.

This progress has changed the surrounding area in negative ways. The traffic in the Craycroft and river corridors has increased to a level considered unacceptable with a LOS D or higher rating. By adding this high-density housing along the Loop, the rating will get worse from a LOS D to an LOS E and F, which would be considered failing, but the developers think that is already going to happen so lets just pile on more traffic. The taxpayers will have to pay for upgrades to allow the traffic flow adjustments based on the new proposed ingress and egress to the high-density housing area.

The proposed development will also be built in an area that has been prone to flooding in the past. With the added concrete or asphalt ground coverage the water collection will impact the area significantly. The proximity to the Rillito River within the 500-year flood plain imperils the area with the added water shedding from the structures and the paved surfaces, not the best of scenarios. Yes the hydrological study based on the specific plan says all is well, until it is not. With climate change and records being broken annually I suggest we rethink the basis of this plan.

The decisions of a homeowner looking to make a quick turnaround sale of their land and make maximum profit by selling to a large developer (parcel A), (it appears that a substantial portion of the vote in the 300' radius is determined by the very plot owners who are looking to change the zoning and profit financially) is typical business I understand that, but does not make it right for the neighborhood. Significant change to the zoning in the area to allow this high-density housing in an area rated to be low density seems like a leap that should not be taken. Changing the zoning to something more in line with the neighborhood that surrounds the area, such as CR-1, would be more fitting for the land use.

We hope the planning commission will reconsider keeping the zoning in this very special area to the already established minimums of 1 home per 3.3 acres or at a minimum 1 home per .83 acres.

Respectfully submitted,

Thomas and Lisa Baumann

3700 N Camino Blanco Place

Case P20SP00002, River House Trust, Et Al - N. Craycroft Road Specific Plan and Comprehensive Plan Amendment

We are writing to express opposition to the proposed rezoning and development of the property at Craycroft Road, "The Loop", and the adjoining Camino Blanco neighborhood.

Just last month we moved into our dream home in the neighborhood north of parcels A and B. We'd lived in our nice Phoenix neighborhood for many years, but were just tired of seeing every inch of the open space in the surrounding mountain area filled in with homes on small lots, condos and supporting retail facilities. It was changing the character of what used to be a rural feeling neighborhood, full of wildlife, dark skies, and low traffic. We thought moving to this Tucson neighborhood that we had found the perfect location with zoning such that we would always have our beautiful views, would be protected from infill, and wouldn't have densely populated neighborhoods springing up around us. The space around the homes, quietness, low traffic roads and small community feel without much development were all reasons we just relocated to our home on Camino Blanco Place. It is so disappointing to see this proposal to rezone this area to allow much higher density homes.

We appreciate that this is an attractive place to live and things change, but it isn't right that the decisions of a couple of homeowners looking to sell their land and make maximum profit by selling to a large developer (parcel A), or by subdividing into far more plots in than the standard zoning would allow (parcel B), can be decided by such a small fraction of those who are affected by these changes (it appears that a substantial portion of the vote in the 300' radius is determined by the very plot owners who are looking to change the zoning and profit financially).

We've just moved here, so we don't know the ins and outs of the zoning codes, or the history of traffic and accidents on Camino Blanco. But we do know for certain from our poor experiences in Phoenix that these types of zoning changes do negatively affect a broad swath of neighbors and they do change the nature of the surrounding community.

We hope the planning commission will reconsider keeping the zoning in this very special area to the already established minimums of 1 home per 3.3 acres or at a minimum 1 home per .83 acres. It's not that we can't have change, but we should allow change in a way that keeps intact the spirit of this unique location to live and protects the views and nature that were primary reasons we all chose to purchase in this neighborhood. We truly hope the Pima County Planning and Zoning Commission doesn't allow this beautiful area to become another Phoenix.

Respectfully submitted,

Leigh Weisshaupt & Scott Bonar

Protest to rezoning of SR parcel A Case #P20SP00002 development of "Endeavour" by Envisage on River & Craycroft Loop

What you call parcel A, is a historic ranch of Tucson. It is and always has been a ranch space and it should intend to be that way. It was originally the Keller Ranch aka Tightwad Ranch, it goes back to the early 1900's, originally for agriculture, it later became for cattle due to the wells. It was here before any homes or roads even existed in this area. Too many out of state developers are coming to Arizona and making homes that are too expensive for our town. There is over development on our lands where there needs to be sustainability. On top of that there is an overabundance of senior living facilities in Tucson, particularly in this area. Just in the last few years at least two were made in this vicinity and they aren't even full. Putting in a large apartment complex that houses up to 400 people is going to destroy the energy and integrity that living here brings, overcrowding the roads on an already over-developed intersection that does not maintain the ideals of what this area of town is supposed to encompass.

Thousands of people cross the Rillito river to come home to a quiet calm atmosphere, adding more apartments and senior living is downgrading the *true* luxury of living in this area of town. The area of Craycroft Road south of River Road is already becoming too busy and dangerous due to new construction, roadways and businesses. Dozens of bicyclists cross and dart through traffic on Craycroft road dangerously to get to the bike loop, and the amount of people coming in and out of the gas station and other businesses is overwhelming.

Senior living is a dime a dozen here, just in this small radius there are more than ten! This venture will not be successful, what will they do when they've built too many homes that will not be filled. They are taking over where young families need to thrive and people and the wildlife need nature. Their plan seems more like a young beach community than a relaxing, quiet community for older people. It is not a calm, quiet community standard, it's something you experience on the boardwalk in LA. This entire project seems to have more problems than solutions. If this was a small single story home community it would do better. Tucson is a unique city, we should be keeping the integrity of our cozy county. People come here for the space, nature, and limited city experience. If you keep approving every development that comes to town, there will be no town left to enjoy. You are going to run out of areas to develop and overcrowd our city with dense population and developments, there will never be a home like Tucson again. The effects to the habitat are irreversible and the integrity and peace of the Rillito and river walk diminished.

Development like this will severely impact the fragile ecosystem and limited water we have. We are in a severe drought, already in Phoenix, Rio Verde Foothills residents are out of water and they will not be the last, this will continue to affect us all very soon. (Sourced 12news.com) This development is going to damage and drain our Aquifers and use up the neighborhood's well water. Even if they don't intend to use this system, the effects will be irreversible. Connecting water through the city is not some easy fix solution, it will create damage to the land and foundation and create piping and plumbing problems. We do not have the reserves or water levels necessary to supply all of Tucson and every new development you bring into town. Water pressure will suffocate and thousands will eventually be left without water. What will you do then? The last test I saw (via

tucsonaz.gov) was in 2018 & 2019. There needs to be a re-evaluation of this, since then the pandemic and weather has affected our water supply greatly. There have already been restrictions put on many farmers in regards to water usage. "In Arizona, 84% of the state is experiencing severe drought conditions and is preparing for its first-ever Tier 1 water shortage cuts." (referenced from www.dtnpf.com August 2021). The federal Government is aware of our limited water and when we run out there will be no systems in place to restore these. Your choice to allow this will forever impact humanity, our planet, and all living things. People need to realize that if over 84% of agricultural farming has been restricted in Arizona, and hundreds if not thousands of others in many other places of the U.S. have been ordered to stop the farming of crops, we will be without food. The federal government has stopped importing a large supply of our food and asked farmers to stop growing crops. There will be a massive shortage of vital foods and nutrients and there will be a desperate need for sustainable farming! Which is exactly what this land offers, the soil is nutrient rich from years of previous farming that has matured. It's valley-like location provides water runoff, and the land is lowered to be able to hold water, plus it is next to the Rillito which brings in new nutrients every time it runs and could be used to harvest water for crops. Very soon there will be thousands of people without food due to the lack of resources from such restrictions and in turn a very high need for farming and agricultural crops for local consumption.

We love all the wildlife here, they have homes in these spaces; from bobcats, foxes, and their cubs whose dens are scattered through the field of parcel A, to a variety of birds, such as hawks, falcons, and owls many of which roost in the ground and plants. To deer, javelina, bunnies, tortoises, and an occasional cougar. This includes threatened and protected species such as the pygmy owl and western burrowing owl, which are federally protected, and the desert Bighorn Sheep (Photos attached below). Per the Endeavour plan, no surveys have been conducted or are planned to be conducted. I have informed the US Game And Wildlife conservation. It would be an unbelievable disgrace to kill these animals in the process of development. It's unfathomable to think that the city & county would not consider the ramifications or protection of such wildlife. We all cohabitat here in peace. These developers do not care about the land, people, history and integrity of this area. They do not live here or understand, they are only doing this out of greed and ego. They do not know the people or animals who live here and the homes they've made. Pushing them from their environments will force a catalyst effect in the ecology, these animals won't have anywhere safe to go. It is vital to conserve and protect this ranch. (As sourced from Pima.gov)

"Ranch Conservation - Ranch conservation helps provide a boundary between the natural environment and the metropolitan area and preserves the heritage and culture of the West. Today, many ranches are faced with rising land prices, changing livestock markets, climatic variability and increasing political uncertainty over access to public grazing land. This has led to the sale of their private land holdings to developers, thus creating urban sprawl. Pima County has participated in a number of ranch conservation efforts such as Empire, Cienega, Empirita and Posta Quemada ranches, which have been successful in reducing urban sprawl." This ranch NEEDS to be preserved! Amongst endangered wildlife is old archeological sites, historic items, floodplains, and riparian areas. This would be very challenging to develop and would run into many problems and time that cost more money.

The borders of city style living & developments have overstepped their bounds in this area of town. Particularly this intersection alone has been over developed in such a short amount of

time. The land cannot handle all of these developments. This is not the way this area of town is supposed to be. I grew up here and I've seen the changes that have occurred in the last few years so quickly. It used to be such a quiet, calm area with little traffic, and now it's becoming more like a busy city than a peaceful suburban area. We are infringing upon the nature that we are supposed to be stewards of. These developments are not appropriate and the systems you have in place for the public are unfair and obscure. You are acting more like a dictatorship than a democracy and not listening to the community. This is supposed to be a place for nice, quiet homes that blend into the scenery, not large complexes that destroy wildlife, kill the habit and ruin the natural experience and aesthetic. We need someone to protect and preserve these values! As a member of our community and a leader in the future of all of our lives, you need to think about the true implications. Not just the money. You cannot undo the changes you put into action. It's important not to make changes simply for changes sake without first evaluating the consequences of these decisions. The impression I get from those in power is that they just want to get through these items and build whatever to get things passed, when careful thought needs to be put in regards to the truth of the future that's not too far ahead. Things will never be the same as they once were in the scope of social and economic territories. The way of life we once knew is no longer valid during these shifting times and the new era of being coming into play. Future endeavors will favor sustainability over senior communities and developments due to lack of resources for human consumption and survival and these large developments will become obsolete. This building could end up being demolished to go back to farming that will be desperately needed and creative inventions for hydrology systems will be put in place.

A structure and community such as Endeavour is too much for this area! The structures are too much for this land to hold. There are so many old well drilling holes from decades ago, more than appears, which could host several large cracks in our foundation and what lies beneath that are the aquifer systems. With all the volcanic eruptions, droughts, and Earthly shifts. This land will not be able to withstand even ONE of their complexes!! It's too big, the buildings are too tall, the density is exorbitant for this space, and the risks are too high. Please do not disregard this message, it is imperative. There are dozens of rows of hand dug, and old drilled wells that cover and line the entire parcel, back when they created these from the aquifers (early 1900's), the methods and systems of doing such were not to the safety standards we are aware of now. Multiple holes were drilled & tested and the amount of sites they tested and installed, the chances of piping around these old folded & riveted pipes are quite high which could cause a collapse. The wells need to be inspected thoroughly and ground tests concluded, even if these are mostly sand grained areas they used to be swap like, which is why "camp lowell or fort lowell" existed there when it did. The land cannot handle the tons of pressure from these buildings. There could be old artifacts as well, either from the Mormons who created the earlier irrigation ditches or the indigenous communities. (Information sourced from retired geologist & former well driller for Tucson water) We have already seen historic items scattered throughout the field, this will need to be protected and cared for. Focus needs to be on sustainability, we need a future where people *and* nature thrive. It is of dire importance. A more wholesome solution is just around the corner that would benefit everyone. We need to honor this unique and fragile desert ecosystem and our predecessors who saw the true potential of this farming space. We are all losing touch with nature, & humans need nature! We need to have more systems in place here for the future of our survival. The actions



we take this decade will define the planet's path over the next century. Developing this Endeavour community will be something that is riddled with regret in our foreseeable future.

During these times more and more people are unable to afford care for the seniors in their life and with COVID they are forced to have these seniors move into their homes. More often than not this is the new way of living that you will and are seeing everywhere. People cannot afford to pay their families senior expenses and those communities lower the quality of a neighborhood, lowering property values, creating more crime, traffic, pollution, lack of resources, diminished peace and serenity. It is not fair to change the status of zoning once a resident has purchased the home. Especially if chosen due to the zoning and surrounding areas. On top of that, these new senior living communities recently built in the area were brought into action before the pandemic. Many people do not want to live in these types of communities anymore, due to covid related reasons. Many of these senior communities aren't completely open or even full. It's success will not be high for those looking to profit from these overdone condos. What do they plan to do when this endeavor fails? These senior living facilities will not have enough employees or members to survive and it would be a massive waste of resources and natural space to build such a place. As someone who formerly worked at a "thriving senior living community". I can tell you that seniors are very active, they drive, they party, and sickness and disease spread fast. Due to the vast resurgence of the virus and the facts we've seen so far, this pandemic is not going away anytime soon. Inevitably you are putting our health at risk. People are still becoming ill at an alarming rate, the vaccines are not sufficient enough protection and with the way governments are trying to implement forcing people to be vaccinated against their will and beliefs, there will be a massive shortage of employees everywhere and seniors are no different of people with their beliefs and protection of their bodies; not everyone can even receive these shots. There are no plans in action in coordination with such events from the Endeavour project, and a severe lack of common sense in regards to the public health crisis and protection of seniors and employees.

Envisage Living Communities is greedily destroying our land and homes to use and pray upon for their own selfish purposes. We do not want them here or their "endeavours", they do not respect us, our homes or environment. They do not care about the wellbeing or welfare of others and how this development will affect and impact everybody, their sole interest is in themselves. Their website says they "believe in disruption" and that's exactly what they are causing in this neighborhood and town. This development & complex will continue to do exactly that during its existence and continuity. Disrupt the flow and sanctity of our surrounding neighborhoods. It is not something we want near our homes. A major key factor in the Envisage groups scheme is that they have purposely marketed their project as a 70+ aged community to make it appear like it's going to be a calm, quiet community but this is a misleading approach based on a misconception that older adults are quiet, go to bed early, and don't do anything. It is a fact that this is a fallacy and completely untrue. I know many older adults in their 70's, 80's, & 90's, who are very active, social and vibrant people, they ski, they go to bars, concerts, dance, play in bands and sports, many drive more than the average adult in order to go to doctors appointments, shopping, and finding activities to get them out of the house and stay busy, they also stay up late or wake up early. So trying to pitch this place as a calm, quiet atmosphere is purposely misleading in order to sneak in what they really want... money. This developer cannot be trusted, we can't rely on Envisage to actually do as they have planned. They could make leeways of who lives there or what they bring in

and let's say they don't succeed as a 70+ age community.. I have heard there will be strict CCNR's but if Endeavour is going to fail profit wise as a senior community what will happen to the property, could it be sold or rezoned again and used for any other purpose such as a regular apartment complex, a resort or used as rentals for Airbnb. They are truly over reaching with this complex community plan. There has been no care, consideration or respect for the people who live and have grown up here. All these people, tenants, staff, visitors, and the like are all going to take over our space around our homes, overcrowding the area, causing trouble, playing loud music, having parties, and causing disturbances for the entirety of its being around.

We will be losing a loving home and healing, peaceful space. There will never be quietude here again if these plans are approved. While in theory, the marketing pitch for the project may sound like a fun idea, it's a gimmick and is not the right fit for this space. Nor does it support the ever changing times we are in now and will be living in for the foreseeable future. The true endeavor we need to take is those of sustainable functions over idealized profits. In conclusion, I object to this development plan, but if this project is still to be approved, I ask that it be dramatically downsized by height and width, making more single leveled home style living or what other senior living communities refer to as bungalows (which are much more desired and suited for this space), also there needs to be more preservation of the land, space between neighbors, and space for the wildlife which needs to be carefully surveyed and cared for before & during construction. It would also be suggested from personal opinion to let the owners of parcel 109-26-003D keep "their backyard" with the pond remaining as theirs, that's just taking too much, also to work off the existing dirt driveway instead of demolishing a home, seems more practical.

Anna Smith

I am located within notification distance and received notification

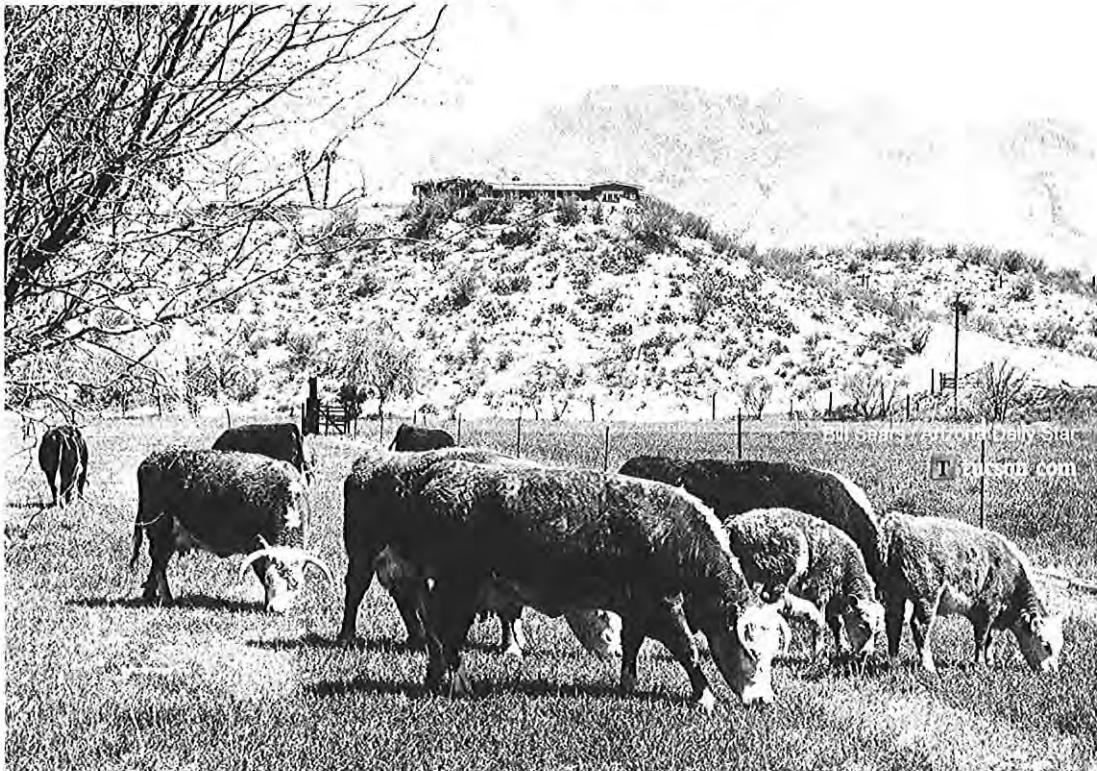
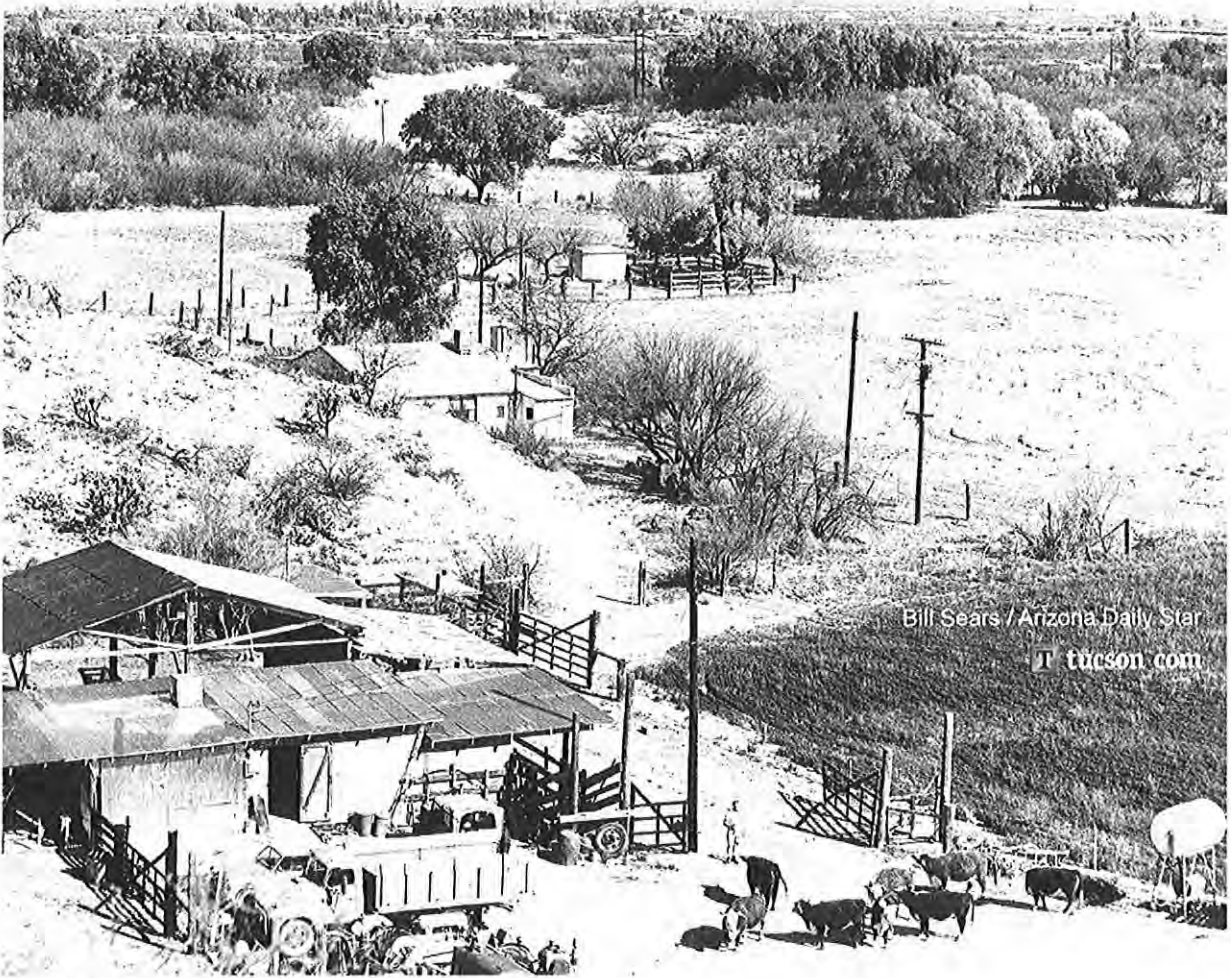


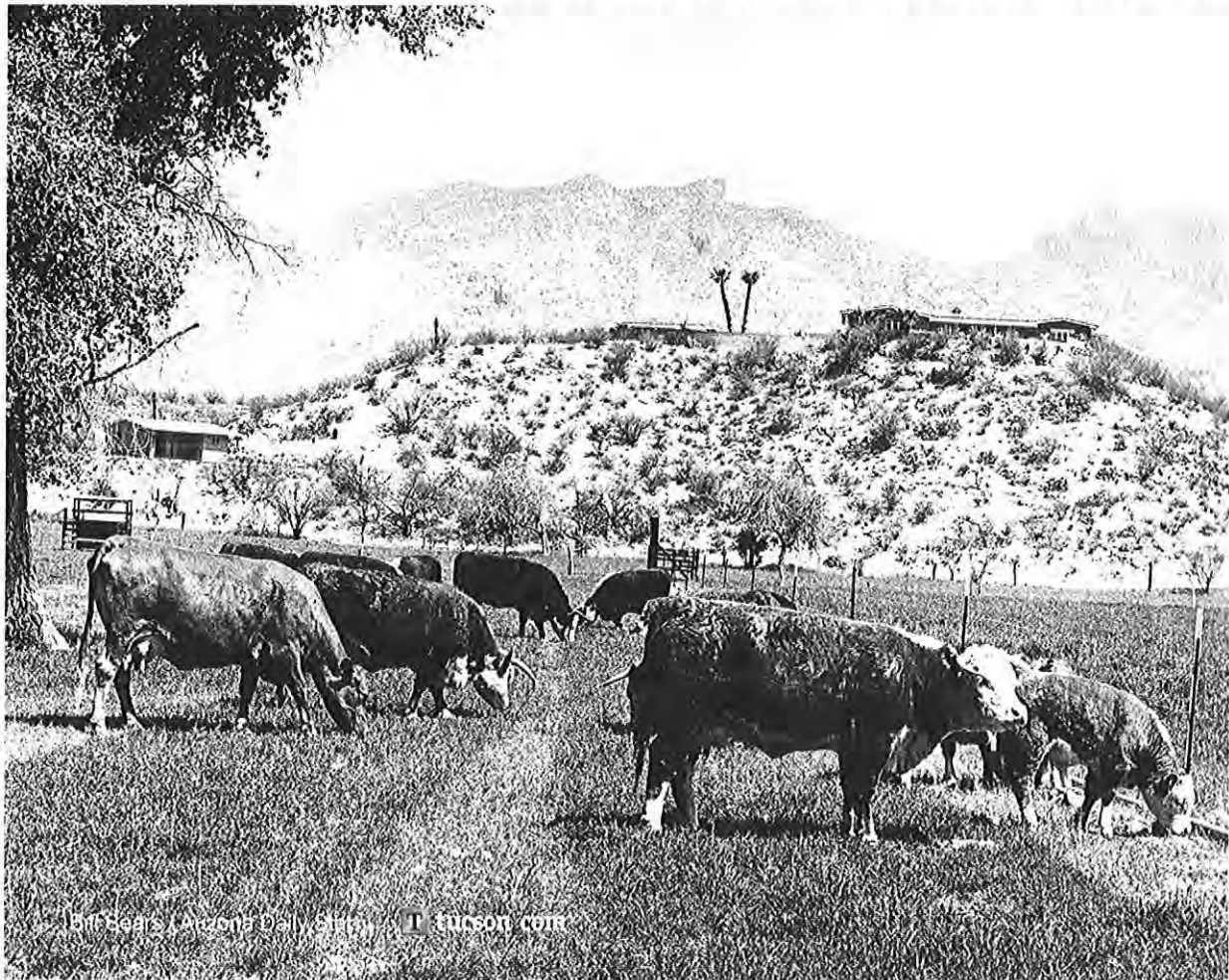
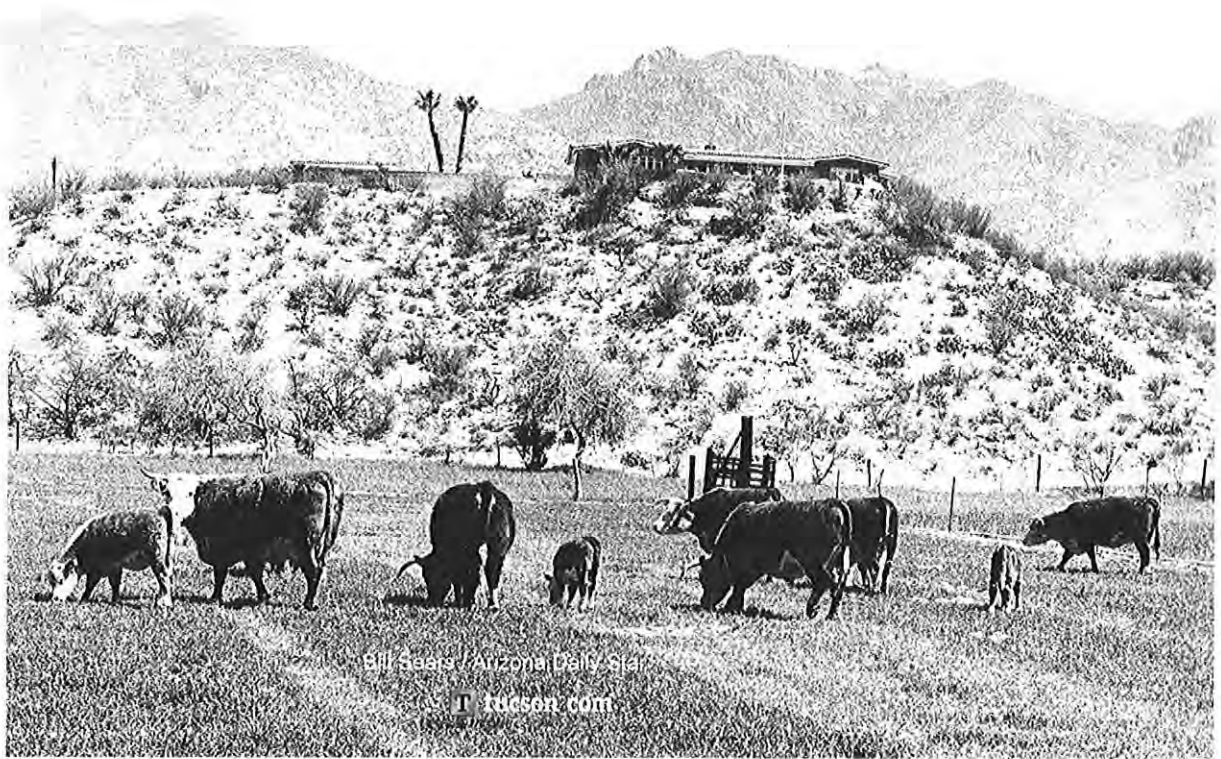
(Please see important attachments below)

Protest Statement in regards to:

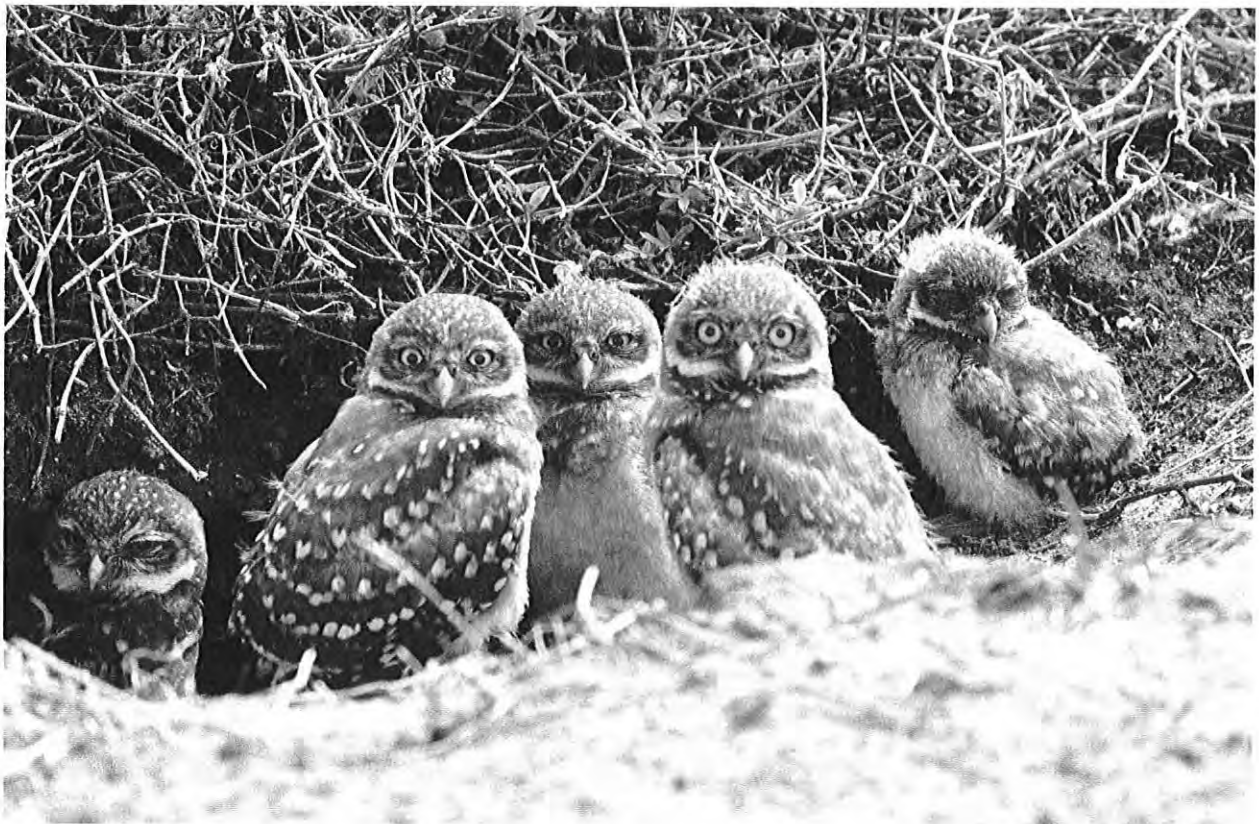
Case# P20SP00002 RIVER HOUSE TRUST, ET AL.- N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN
AMENDMENT Tax Code(s): 109-26-003H, & portions of 109-26-003D, 109-26-004D
property located at approximately 1,200 feet southwest of E. River Road and N. Craycroft Road

Attached are photos of what was formerly called The Keller Ranch in the early 1960's, before homes lined the hills or roads & bridges existed here. Photo looks out over the Rillito River facing southeast where Craycroft Road bridge and Fort Lowell park currently lay. (Taken in 1960s)





Below are the current animal residents you will be harming and/or killing in this development.
(All listed and photographed species are confirmed). Arizona Western Burrowing Owl (protected
under federal law)



The Kit Fox and Fox Pups amongst other species of foxes.



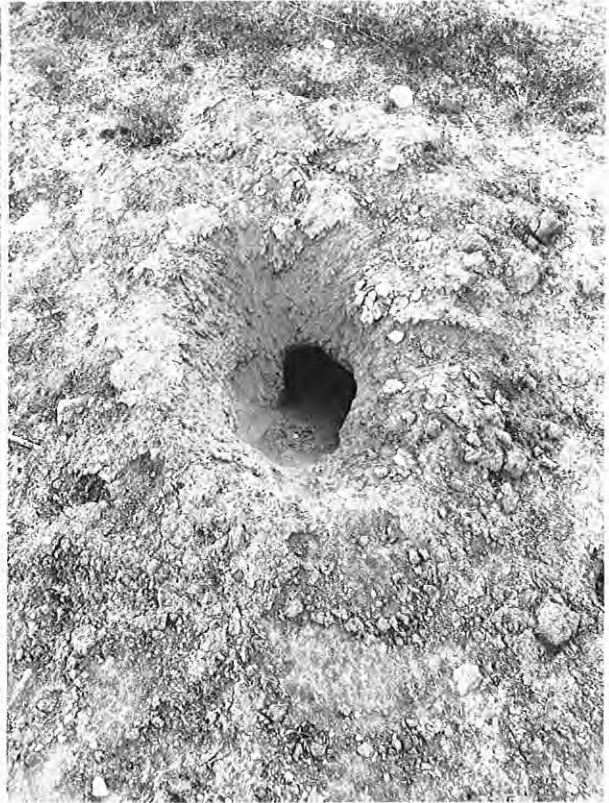
The Great Horned Owl, The Barn Owl, and the Western Screech Owl



Arizona Bobcats and their Kittens



As well as the slow moving Desert Tortoise, Deer, & Bighorn Sheep (photo of tracks below). A handful of dens associated with said animals listed above, located on Parcel A





Date: January 23, 2022

To: dsdplanning@pima.gov

Re: Case P20SP00002, RIVER HOUSE TRUST, ET AL.- N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

We are writing to express our opposition to the rezoning of P20SP00002, River House Trust, Et Al - N. Craycroft Road Specific Plan and Comprehensive Plan Amendment.

We live within the 300 ft Notification Area of the planned rezoning and land use change and formally protest these proposed changes.

I attended the neighborhood meeting held on January 10, 2022, and was less than pleased by what I heard. The proposed rezoning of Parcels A and B is incongruous with the area and inappropriate for the existing community of single-family homes.

While the planned Endeavor Spirited Living development on Parcel A seems nice for what it is, the proposed location is not the proper place. Perhaps Envisage Living Communities could find a more suitable location in the City of Tucson—an entity which is actively encouraging high density urban infill, despite its detrimental impacts on longstanding neighborhood communities.

The plans for Parcel B are equally inappropriate. That parcel already contains 12 housing units that are not in accordance with the existing zoning. Rezoning to allow even more high-density development on that parcel is rewarding an already out-of-place development and further putting that parcel at odds with the character of the extant neighborhood that it is a part of (and the zoning/land use restrictions that are in place regulating this neighborhood). If the rezoning request is approved, it would allow for 19 additional tightly-packed units, to go along with the existing 12. This basically situates a high-density housing development down a small, winding, ill-maintained county road, and in the middle of an established C-1 neighborhood. This is no one's idea of good planning or development. If Parcel B is going to be rezoned, it should be rezoned in accordance with the surrounding area, i.e., C-1. And if increased access to "The Loop" is part of the County's development goals, neighborhood access should be part of the Special Plan, through Parcel B.

Rezoning out from under long-standing and established zoning is fresh in my family's experience as it is the primary reason for us leaving our long-time residence in the City of Tucson and moving into our new home in Pima County.

Our family moved into our house at 3622 N Camino Blanco Place less than a year ago. We scouted out and moved into this location and this neighborhood for the safety, quietness, low traffic, large lot sizes, open space, scenic views, and general serenity that it offered. We were fleeing from northside Tucson (Mountain/Kleindale area) where crime, noise, traffic, and

general disarray were on the increase. To make matters worse was that a 5-acre parcel at the end of our dead end street was bought by developers and with the City of Tucson's blessing, is being developed into much more densely-packed housing than the existing zoning allowed and out of character with the surrounding neighborhood—all in the name of dense urban infilling. Dense urban infilling is apparently a concept which the City of Tucson is embracing, but which I sincerely hope, Pima County is eschewing. While there certainly is a place in the County for new neighborhood developments—rezoning parcels within long-established neighborhoods is not the proper way of pursuing this.

The proposed developments will negatively impact our home and our neighborhood through a degradation of our viewshed, a decrease in road safety, an increase in light and noise pollution, a potential increase in crime, and a decline in the overall serenity of the location, among many other potential negative impacts.

I hope that the members of the Planning and Zoning Commission will take into account our opposition, and our reasons behind it, when deciding on the outcome of this rezoning request.

Sincerely,

Paul and Jenny Knappenberger

3622 N Camino Blanco Pl.

Tucson, AZ 85718

From: [Bertha Riveros](#)
To: [DSD Planning](#)
Subject: Endeavour Spirited Living Project
Date: Sunday, January 23, 2022 7:35:09 PM

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

I object to Endeavour Spirited Living Project.

Name: Bertha Riveros
Address: 5363 E Camino Rio De Luz

I want my email to be added to the Zoning Commission meeting agenda and carbon-copied to the Board of Supervisors as comments of public record.

Bertha Riveros

From: [Douglas Van Dorpe](#)
To: [DSD Planning](#)
Cc: [DOUGLAS & INGRID VAN DORPE](#)
Subject: Fwd: Potential Safety Issue - Traffic off North Camino Blanco onto East River Road and Vice Versa
Date: Sunday, January 23, 2022 11:32:07 PM

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Resending. I screwed-up your email address...an "s" vice an "a".

DOUG

Begin forwarded message:

From: Douglas Van Dorpe <daigvd2@gmail.com>
Subject: **Potential Safety Issue - Traffic off North Camino Blanco onto East River Road and Vice Versa**
Date: January 23, 2022 at 11:01:12 PM MST
To: DSDPlanning@pims.gov
Cc: DOUGLAS & INGRID VAN DORPE <daigvd2@gmail.com>

1. This email is intended for CHRIS POIRIER and/or TERRI TILLMAN.
2. Reference "P20SP00002 RIVER HOUSE TRUST, ET AL - N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT".
3. I live on North Camino Blanco (NCB), westside, address 3811 (adjacent to the Unity Church). My comments fall into the category of a potential safety issue. I will be impacted...as will the Unity Church and all other property owners along NCB...by the development of Parcel B, whose ingress and egress will be via NCB to East River Road (ERR). Traffic is already heavy on NCB. Once Parcel B is done and fully launched, getting off NCB onto ERR, especially to go west toward Swan Road; and off ERR, especially while traveling west toward Swan, to turn south on to NCB, will (in my humble opinion) become more hazardous and dangerous than it already is. As of right now (January 2022), it often times takes some aggressive driving to get off of NCB and onto ERR and off of ERR and onto NCB.
4. Accordingly, are there any plans for Pima County to install a traffic signal at the intersection of NCB and ERR? If not what adverse event(s) would it take to get a traffic signal installed?
5. Thank you.

Douglas Van Dorpe

daigvd2@gmail.com

January 24 2022

Pima County
Development Services Department
201 N Stone Ave
Tucson, AZ, 85701

**RE: Case P20SP00002, River House Trust, Et Al –
N. Craycroft Road Specific Plan and Comprehensive Plan Amendment**

We write to *Object* to the proposed rezoning and development of the property at Craycroft Road, "The Loop", and the adjoining Camino Blanco neighborhood.

We are in the process of purchasing the land of 3602 Camino Blanco Place. We have signed a contract as of December 20 2021 and just learned of this proposal on Friday January 21, 2022.

3602 Camino Blanco Place is within 300ft of the proposed zoning change request. This Project will have significant impact on our future home.

We have interest in this property to build our home because of the rural atmosphere of the neighborhood, the wildlife and natural vegetation in the surrounding area. The current zoning prevents high density and supports the natural setting.

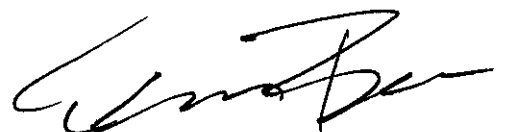
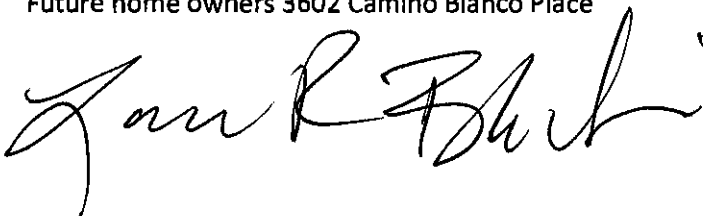
The proposal plans would change all that by introducing dense housing in Parcel A and much taller and even denser housing in Parcel B. The increased population that the Project proposes will inevitably increase area traffic as well as water and utility usage. It overwhelms the current rural neighborhood atmosphere, endangers the animals and vegetation of the natural riparian area. Additionally, the proposed development is partially within a flood zone. This will inevitably require additional flood prevention construction along Rillito Creek, ugly and currently unnecessary, to prevent the development from flooding. Do we really want our waterways to end up looking like the massive and trash-filled concrete "ditches" of Phoenix, just to squeeze a few more dollars out of marginal land?

According to the Specific plan, one issue of note is under Cultural Resources. The Arizona State Museum is already recommending that the 'Property' of Parcel A be resurveyed before ground disturbing activities since an archeological site was identified over 10 years ago. The threats to the cultural and the natural area are real and extreme.

While development is inevitable as populations change, this proposal obliterates a current neighborhood and natural open space resources in favor of commercial development. We advise a more balanced approach that allows for development while observing the existing zoning.

We encourage the commission to reject this rezoning proposal.

Respectfully signed,
Laura Bloomenstein and Eric Boos
Future home owners 3602 Camino Blanco Place



Protest statement to rezoning of Parcel A Case #P20SP00002 development of “Endeavour” by Envisage Living Communities

The proposed Parcel A plan is too big a development to build on that land. The land is a natural floodplain from the rialto river and was built there because of that asset to the ranchers and farmers. The aquifer wells that have been drilled in that area and the natural run off from the hills to the north make the lands integrity an ill fit to match the physical weight and size of the proposed project. It would be wise to downsize the project significantly. It will be a better fit for the land, area of town, and the whole Foothills area.

A major factor to consider with the proposed Plan A is the water usage. Tucson and Phoenix are currently looking at a water shortage and massive drought. Adding a vast amount of homes to such a small space is going to deplete the water levels we have now. If there is no water what is the point of a large development like this?

The amount of traffic added to Craycroft would be immense. Supposedly, the intention is to have more people use the bike path, however it is inevitable that people living here will have to drive to all sorts of places, a lot of which will require them to go into town. Also the majority of the year here is high heat, older adults will not be able to ride their bikes a majority of the year to go places, which are still quite a far commute .

Everyone in the neighborhood has stated that they do not like the size of these buildings, and developing such a large complex without care for all those who already live here is creating irreparable damage to the citizens and showing a lack of care and trust from the county. The idea of three story complexes that are overpacked into the area and marketed as luxury is deceptive, in truth they are overly crowded, compact, and generic living spaces. True luxury is something that is not easily obtained, more valuable than others by comparison, and therefore unique. This plan does not support something that is truly luxurious or unique, everyone who has lived in an apartment complex can attest to this and see that these are no different. Living in close proximity to so many other people isn't a luxury, it's an annoyance.

I feel it's best that this project is greatly downsized to one story buildings with more space and actual nature in between. That would match this area of town better and it would attract the type of people that actually want to be active and utilize the amenities. That would truly offer the environment that will give the people living there a healthy, active home. As of now the developers are trying to market this for healthy, active, older adults, yet the compact buildings make it so that it's more of a difficult chore to be active. These types of details are things to be realized and for the developers to reconsider in the plan. This kind of care and consideration towards the project would actually create a luxury home and get respect from the community.

The developers plan also states that they have not conducted any wildlife surveys and are not planning to. This is not okay. I live very close to this area and walk by this land often. This is something that absolutely has to be done. There are all types of animals that inhabit that space from mountain lions and bobcats to owls and foxes; that I and many others have personally seen. There are endangered animals that live there that are federally protected. This inaction to survey this land for the animals that live there is unacceptable and an extremely necessary step. Not only do a lot of animals live there, it is located right next to the river which caters to all animals for many purposes, mainly as a point of travel between the wash and the hills. They are an integral part of our desert and homes. It is imperative to keep these animals safe.

In conclusion, I am opposed to this developer's project. However, if it's still to be approved, it needs to be examined closer and downsized significantly. It is not practical. If homes are to be built here, they need to be smaller, more spacious, and incorporate a more eco-friendly, natural environment that is sustainable. Housing like that compliments this area far greater than the proposed plan and would be a more beneficial fit for this space.

Thank you,

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

I am located within notification distance and received a notification

Protest Statement in regards to:

Case# P20SP00002 RIVER HOUSE TRUST, ET AL.- N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT Tax Code(s): 109-26-003H, & portions of 109-26-003D, 109-26-004D property located at approximately 1,200 feet southwest of E. River Road and N. Craycroft Road

Date: January 23, 2022

To: dsdplanning@pima.gov

Re: Case P20SP00002, RIVER HOUSE TRUST, ET AL.- N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

We request that Case P20SP00002, RIVER HOUSE TRUST, ET AL.- N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT be disapproved or modified. After reviewing all public comments to date, entirety of the Endeavor Spirited Living Specific Plan, proposed rezoning and use for identified Parcels A and B along with Pima Prospers directive and guiding tenets, we have compiled the following questions, concerns and recommendations to be addressed at the January 26, 2022 meeting.

Statement = (S); Questions = (Q)

(S) "Use of Land, Land Use Element. Pima Prospers Amendement the Property, located near the intersection of River and Craycroft and directly adjacent to The Loop access at Craycroft Road is currently identified as Low Intensity Urban – 1.2 ("LIU- 1.2") within the Catalina Foothills Planning Area of Pima Prospers. Concurrent with this Specific Plan proposal is a request to amend the Property's Pima Prospers land use designation to Planned Development Community ("PDC"). The PDC designation is meant for properties planned as a single community with unique features and designed within the context of its environment." "This Specific Plan is consistent with the intent of the PDC designation, as well as the goals and policies of Pima Prospers. The following policies from Pima Prospers are relevant and support this Specific Plan."

(Q) Designed within the context of who's environment?

This sounds like it gives complete control to the developers to determine "context" without consideration for the surrounding community and its residents; including indigenous wildlife.

(S) Policy 3.1.1.4: Support land uses, densities, and intensities appropriate for the urban, suburban, and rural areas of the unincorporated County.

(Q) How is this appropriate for this neighborhood and what will our neighborhood be considered after rezoning; urban, suburban or rural?

(Q) Current zoning allows for horses and low density, will proposed rezoning eliminate this?

(S) Policy 3.1.1.6: Promote a compact form of development in urban and suburban areas where infrastructure is planned or in place and the market is receptive.

(Q) Who or what is "the Market"?

(S) Policy 3.1.1.7: Support and incentivize horizontal and vertical mixed-use development and redevelopment in character and scale with existing development.

(Q) How is this in character and scale with existing development, what are the boundaries, if any for existing development?

(S) Policy 3.1.1.9: Consider in all land use decisions access to work, school, services, infrastructure, and healthy foods to create healthy communities, including pedestrian and bicycle infrastructure and amenities.

(S) According to Ms. Silvyn (representation for development) her statement from the January 10 meeting: "bicyclist and pedestrians will have to use a bridge on the loop to get to the other side of Craycroft. This will be constructed in the future separate from this project."

(Q) When will this bridge and access be completed and who is funding this project?

(Q) Since the Endeavor Spirited Living project will be completed before the aforementioned bicycle and pedestrian bridge, what are bicyclist and pedestrians to do for safe access to the Loop in the meantime?

*(S) Policy 3.2.2.1: Utilize infill development to strengthen existing neighborhoods, create the higher density necessary to support desirable services, **increase the tax base**, and make our communities more efficient **without being disruptive to existing neighborhoods**.*

(Q) How is this proposed rezoning NOT disruptive to our existing neighborhood?

(Q) What recent concessions if any were made by the developer Endeavor Spirited Living regarding location of and height of proposed apartments and where is this shown on the specific plan? Where are the three-story buildings going now? The specific plan shows them currently all on the East part of the development.

Concerns:

- Proposed height of Endeavor Spirited Living apartments exceeds (24', per Catalina Foothills Special Area Policy) disruptive to sightline of our neighborhood.
- People who exit the River Path Park and make a U-turn increase chances of accidents, traffic speeds in excess of 50 mph are common on Craycroft. Unless a raised median is built like the one used on Swan Road at the river Path exit, people will simply make their U-turn using the middle lane of Craycroft; not the proposed location at traffic light by the Gregory School. Who pays for the nearly half mile of raised concrete median?
- With no concurrent provision for access, there is no way to prevent pedestrians and cyclists from using the River Park entrance. Nothing in the plan shows a provisional safe path for cyclist and pedestrians traveling either North or South on Craycroft
- With all the modifications to the existing specific plan, newly revised plan will need to be reviewed by all parties and their representation, allowing adequate time to respond; will this be addressed at the January 26 meeting?
- Proposed traffic use estimates for Camino Blanco are incorrect.

As stated in Endeavor Spirited Living Traffic Impact Study, page 167 Endeavor Spirited Living Specific Plan, "With Access from River Road via Camino Blanco Parcel B project access will only be to the north via River House Road and Camino Blanco toward River Road. This route would also be a secondary access for Parcel A in the event of a blockage on the Main Access Road. There would be a gated fence disallowing regular access from Parcel A."

However, the following paragraph in the Pima County Subdivision and Development Street Standards clearly states that for the number of units in the Endeavor Spirited Living proposed development, THREE access locations are required; two are provided. How can traffic be limited to Craycroft entrance/exit only? The access point to Camino Blanco is deemed as "emergency use only" when clearly a second regular use access point is needed/required, which is still one access point less than indicated in the Pima County Subdivision and Development Street Standards. Apparently, all rules and standards are negotiable when financial incentives take precedence over data and facts. "Pima County allows for Modifications of Standards when strict compliance with the Standards may be infeasible." Another way of saying it will cost the developer more money than they are willing to invest to be compliant. "Pima County staff is aware of the topographic and ownership constraints that will not permit a third access point".

Where do we draw the line for changing the rules?

"Access Requirements in the Pima County Subdivision and Development Street Standards the Pima County Subdivision and Development Street Standards includes requirements for the number of access locations dependent on number of units. For this project, three access points are required and two are provided. Pima County allows for Modifications of Standards when strict compliance with the Standards may be infeasible. Pima County staff is aware of the topographic and ownership constraints that will not permit a third access point. As such, Pima County staff acknowledges that a Modification of Standards will be requested at the time of Development Package."

Recommendations:

- Rezone parcels A and B to allow single family residence with limited density (2-3 homes per acre).
- Limit all structures on Parcels A and B to no more than two stories defined by Pima County Zoning Code.
- Provide residents North of development paved path to access River Path.
- Create contiguous wildlife corridor to allow unimpeded wildlife migration North and South along proposed development.
- Do not force right turn only for Craycroft access going North.
- Neighborhood road improvements and enhancements
 - Remove dilapidated wooden fence along South side of River House Road
 - Straighten blind-curve areas on N. Camino Blanco
 - Due to increased vehicle traffic, widen Camino Blanco with improved shoulder to make walking and cycling safer
 - Pave N. Camino Blanco Place, to improve neighborhood aesthetics promote a healthy environment and drastically reduce fugitive dust that is a known health hazard to all residents.

(From Pima County Dept. of Environmental Quality regarding Airborne Dust)

*Airborne Dust is Particulate Matter Pollution Particulate Matter (PM) is simply airborne dust, and consists of microscopic solid particles that become airborne from many types of sources, including dirt roads. Pima Association of Governments states that about 50% of PM in our community comes from using motor vehicles – exhaust, brake and tire wear, paved road dust, and unpaved road dust. **PM is harmful to human health and contributes to, among other things, difficulty breathing, heart attacks, and even premature death. Airborne dust affects all individuals, especially children, the elderly, and people with existing heart and respiratory disease.** It is also a public nuisance which can damage property and reduce quality of life. PM can reduce visibility, interfering with beautiful scenic views, and can create a hazard while driving. It is a federally regulated pollutant that must be minimized.*

Closing statements:

As many others have pointed out, we are not opposed to responsible development that keeps the zoning limited to something reasonable like 2-3 homes per acre. A balance of homes and stewardship of this unique lower foothills area will allow increased tax revenues while protecting our native wildlife that is a big part of the foothills living experience.

We recommend the proposed rezoning plan to be modified and a revised draft of the Specific Plan be published for public review.

Signed,
Jeff G Capara and Carolyn Carbone
3740 N Camino Blanco Place

The block contains two handwritten signatures in black ink. The signature on the left is for Jeff G Capara, and the signature on the right is for Carolyn Carbone. Both signatures are fluid and cursive.

I am writing to strongly oppose the rezoning of P20SP00002 RIVER HOUSE TRUST, ET AL. - N. Craycroft Rd., both Parcel A and B.

Per the staff report, the site (Parcel A and B) is within the Biological Core Management Area (BCMA) and Important Riparian Area (IRA) designation. This official wildlife pathway provides a much-needed corridor for wildlife moving between the river and foothills. Riparian areas supply food, cover, and water for a large diversity of animals and serve as migration routes and stopping points between habitats for a variety of wildlife. The proposed rezoning does not adequately consider this and new development on these sites will put undue stress on wildlife moving between the river and foothills.

The new site also is within the 500-year flood plain and the replacement of the landscape with impervious paving and new buildings will increase runoff and degrade water and sediment quality in the Rillito River. Concrete cover in this area will not only increase the intensity of runoff, but the quality of that runoff (from newly paved roads and developments) will contribute to the flooding seen in this area. Our community values the established viewshed to the river, native Sonoran Desert landscape, dark skies, and abundant wildlife in this area. These elements are valuable and preserving them is a more intelligent, long-term strategy for keeping Tucson a livable city. Please consider encouraging the restoration of sensitive riparian areas rather than approve low quality developer-driven 'development' and the undesirable conditions it will bring.

I would like to recommend a study take place on the impact that the new development will have with the removal of trees and grasses in the riparian area that support our native wildlife and help stabilize streambanks and reduce floodwater and downstream flood peaks.

The rezoning of these parcels does not support the Pima prospers plan and by inserting hundreds of units and 22 new residential lots an undue burden on the traffic, safety, and lifestyle of this small community will be felt. The community along Camino Blanco will no longer have the small rural feel that people appreciate about this area and the proposed height of homes and apartments will negatively impact the sightlines and viewshed of our neighborhood. The proposed single-family residences will have a huge impact on the traffic along Camino Blanco and make a questionably safe street, highly unsafe for drivers and pedestrians. Additionally, proposed traffic use estimates for Camino Blanco are incorrect and I request an official traffic study take place before consideration of any new development on these parcels.

Sincerely,

Jared Logue

To Whom this may concern,

I strongly protest and object to the rezoning effort P20SP00002 presented on January 26, 2021, for the following reasons:

1. The views from my home will be severely impaired

I purchased the Ramsay family home at 5476 E. River Road in April 2016 from my mother-in-law, Lois Ramsay specifically for the views and the family history in the home for 50 years. I have done extensive updating and upgrading to the home and consider it my dream home of which I have worked extremely hard over the course of my life to achieve. **This rezoning will change the views forever and my dream home will never be the same.**

2. The traffic leaving and coming to my home will be unmanageable

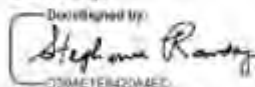
When the development to the North of my home occurred, the entrance from River was closed causing an inconvenience and requirement to enter and exit my home from Craycroft. As the Riverwalk has become developed and gained in popularity, the Craycroft entry and exit has become overburdened. The Craycroft entry and exit has people and bicycles frequently coming in and out and is often a dangerous intersection at popular times of the day. **This rezoning will overburden the Craycroft entrance and exit even more, making it extremely unmanageable.**

3. The wildlife and vegetation around my home will be destroyed

The planned development is on a flood zone, not sure what the impacts will be.
This rezoning will negatively change the wildlife and vegetation we currently enjoy in this neighborhood

I took off work and was at the meeting on January 26th on the phone for several hours but was not able to speak because the facilitator never took the phones off mute. Only people on the TEAMS call were asked their opinion. This resulted in a lot of frustration and tears for me as I listened to the development plans for the first time and could not see the slides being presented. I would like to be informed of future meetings and would like to also have the zoom information given to me if that is the only way to have my voice heard on this rezoning that impacts me and my family significantly.

Sincerely,

Digitally signed by

DN: cn=Stephanie Ramsay, o=Stephanie Ramsay

Stephanie Ramsay
5476 E River Road
Tucson, Arizona 85718
520-245-5306
Stephanieramsay1@gmail.com



Coalition for Sonoran Desert Protection

738 N. 5th Ave., Suite 205
Tucson, Arizona 85705
520.388.9925 • sonorandesert.org

January 24, 2022

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
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
Tucson Audubon Society
Tucson Herpetological
Society
Tucson Mountains
Association
Wildlands Network

Planning and Zoning Commission
Pima County Development Services, Planning Division
201 N. Stone Ave, 1st Floor
Tucson, Arizona 85701

RE: P20SP00002 River House Trust, et al. – N. Craycroft Road Specific Plan and Comprehensive Plan Amendment

Dear Chair Hook and Commission Members:

I am writing on behalf of the Coalition for Sonoran Desert Protection and our 30 member groups. We are writing today about a Comprehensive Plan Amendment and Specific Plan proposal, P20SP00002 River House Trust, et al. We have significant concerns about this proposal, as outlined below.

The Coalition is concerned with preserving lands that fall within the Conservation Lands System (CLS). More than 27% of lands on this parcel lie within the CLS, designated as either Biological Core Management Area (BMCA or Bio-Core) or Important Riparian Area (IRA). Very little of the IRA is proposed to be conserved on site, and none of the Bio-Core is proposed for either on- and/or off-site mitigation. While we understand that the site has been previously disturbed, there are policies to address this in Pima Prospers, as detailed below.

The staff report states “the areas of the BCMA were disturbed prior to the adoption of the CLS, therefore no mitigation is required.” However, in an early reference to the issue of the CLS, the County Administrator has said, “*the map is the map is the map.*”

Riparian Mitigation:

Page 8 of the staff report states, “(t)he north bufferyard will vary between 0 to 20 feet-wide and is proposed as a mesquite bosque containing a higher density of velvet mesquite...”

We are unaware of any native desert tree whose canopy, at maturity, would be confined to a 20 foot space. In the southwest, a bosque is defined as “a grove or clump of trees; a gallery forest found growing along a river bank or on the flood plain of a watercourse.” A 20-foot wide or less strip of bufferyard will not support a “mesquite bosque;” a 0-foot wide strip will obviously not support even one tree.

Also,

“(r)iparian habitat mitigation will include the 0.8-acre drainageway which will become an improved channel with additional plantings. This drainageway will also provide a wildlife linkage through the project for wildlife movement.”

We do not see the drainageway clearly delineated or further defined and, as with the 0-20 foot bufferyard, question whether it can support even a single row of trees, let alone sufficient vegetation to provide cover for wildlife permeability. In addition, the widest bufferyard of 50-foot or more on the south aspect contains, as per the staff report,

“a combination of paved and unpaved internal pedestrian circulation paths. Public amenities, including a diner, shade structures, tables and seating areas may be located within the bufferyard.”

The best example of an existent bosque on the site is proposed to become a part of the expanded Loop parking area.

Wildlife Connectivity

In terms of wildlife connectivity, the Specific Plan does not adequately address what has been documented as within the Rillito Creek/Tanque Verde Wash Riparian Wildlife Movement Area (AGFD 2013), a regionally significant wildlife corridor that connects protected habitat blocks in the Santa Catalina Mountains, Rincon Mountains, and Saguaro National Park East to the Santa Cruz River. The staff report states,

“(d)ue to its proximity to Rillito Creek, the site likely facilitates some north-south wildlife movement between the Rillito and the Santa Catalina Mountains, which could be disrupted by this project. The additional riparian habitat to be created along the internal drainage may mitigate these impacts. Care should be taken when designing this new habitat to ensure it can facilitate some wildlife movement across the site.”

In other words, wildlife connectivity and movement is questionable, at best.

Conservation Lands System Mitigation:

There are various methods to address compliance with the CLS. There are 5.45 acres of Bio-Core, with a mitigation ratio of 80% on-site conservation or 4:1 offsite mitigation, or a combination of both. If off-site mitigation is determined to be appropriate in this case, the property owner should be required to purchase and preserve 21.8 acres of like or better habitat in the area. Pima Prospers states:

In terms of conservation and mitigation of the Conservation Lands System options mentioned above, here are some of the ways that can be addressed:

- On-site conservation of the riparian areas and the Bio-Core can be set aside on site, and previous disturbances to both areas can be mitigated by protecting, restoring and enhancing the entire areas, or at least 95% of the riparian and 80% of bio core. This is especially important within a major riparian corridor such as the Rillito Creek.
- Pima Prospers allows for off-site mitigation of CLS lands. For Bio-Core, that would equal 4 acres preserved off-site for disturbance of 1 acre on the development site under the Conservation Lands System Off-site Mitigation guidelines (see Pima Prospers Chapter 3 – Use of Land, Section 3.4 – Environmental Element). In this case, the landowner would preserve 21.8 acres for the 5.45 acres of on-site disturbance. Disturbances to the riparian areas are regulated and will be administered by the Regional Flood Control District.

- While we agree that protection of the 2 areas that contain mature saguaros is appropriate and saves the proposed project further consideration under the Hillside Development Zone, it does not compensate for the proposed loss of Important Riparian Area or Biological Core habitats.

Additionally, page one of the staff report refers to the Schroeder's Well and the Davidson Flume as an important cultural resource to protect. This is not illustrated or reflected in the Specific Plan's concept. We read the comments from the Tucson Historic Preservation Foundation, which provided a detailed account of the importance of this area and concur with their conclusions. We also agree with the detailed comments from neighbors, regarding wildlife connectivity and natural resource concerns.

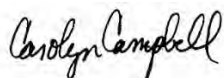
While we appreciate and generally support the Independent Living concept, the project would be vastly improved by the removal of some of the apartment units and re-configuration of the Independent Living Units. Though not clearly identified, what we assume to be the north-south drainage corridor appears to be 25 feet or less in width so we have serious doubts that it will provide sufficient habitat or connectivity for creatures other than small mammals, reptiles and perhaps the occasional javelina. Coyotes, bobcats, fox, and other mid-size carnivores may be seen as a nuisance and larger mammals will not use the area due to the adverse impacts of development such as light and noise pollution, odors, and domestic pets.

The functions and values of the adjacent lower density residences could be best maintained and complimented if the number of parcels proposed for development on the western parcel were decreased. Forbidding lot line fences or walls would enhance permeability. Building envelopes that maintain a minimal percentage of disturbance and preserve and enhance a native vegetation palette would best support wildlife. The Arizona Game and Fish Department's Technical Report #20 describes that densities of CR-1 or less dense are best for supporting native wildlife, landscape permeability and connectivity.

We would note that the Chuck Huckelberry Loop Focused Development Investment Area (FDIA) seems to be in conflict with cultural and historical resource protection and the Conservation Lands System goals and policies, especially with regard to our most limited and precious resources, areas of designated riparian habitat and wildlife movement corridors.

In summary, the Coalition for Sonoran Desert Protection cannot support this Comprehensive Plan Amendment and Specific Plan as presented to the Commission and would like to see the Commission recommend denial to the Board of Supervisors. Thank you for your consideration of our comments and concerns.

Sincerely,



Carolyn Campbell
Executive Director

From: [shane dean](#)
To: [DSD Planning](#)
Subject: Opposition to the rezoning of P20SP00002, River House Trust
Date: Monday, January 24, 2022 2:07:05 PM

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

To whom it may concern,

I am writing to express my opposition to the rezoning of P20SP00002, River House Trust, Et Al - N. Craycroft Road Specific Plan and Comprehensive Plan Amendment.

I live with the 300 ft Notification Area of the planned rezoning and land use change and protest these proposed changes.

In mid-to-late 2021, I moved into my house at 3612 N Camino Blanco Place. I moved from the 1st and Ft Lowell area of Tucson to escape from the high density urban conditions there and the noise, crime, traffic, etc., that come with it.

I researched the zoning classifications that governed the properties in the Camino Blanco neighborhood—primarily C-1 and less dense—and this information strongly factored into my decision to purchase my new home and move out of the City of Tucson.

Another primary factor in my decision to move was the viewshed of the Camino Blanco property, not only are the Catalina mountains to the north, but there is a splendid city view to the south, looking out the mouth of the little valley that forms the neighborhood.

Now, less than 6 months after purchase, I am extremely unhappy to hear that the primary reasons for me moving here are now under threat. I am dismayed that the existing zoning and land use codes are under consideration to be rezoned to allow high density housing beginning less than 300 ft from my property—some of which will directly and negatively impact my new viewshed. If Parcel B is to be rezoned and developed, I would request that the new zoning be commensurate with the zoning governing the surrounding long-standing neighborhood, and that such development serve to enhance, rather than detract from, the existing setting. Such an enhancement, for example, could be neighborhood access to The Loop.

I urge the members of the Pima County Planning and Zoning Commission to reject the current Comprehensive Plan Amendment and Specific Plan requested under P20SP00002 as it now stands.

Shane Dean
3612 N Camino Blanco PL
Tucson AZ 85718

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shane dean

2502 north first avenue
tucson arizona 85719

t 520.791.7035
f 520.791.7075

www.reppmclain.com

From: [Mary Kingsley](#)
To: [DSD Planning](#)
Cc: [Terri Tillman](#)
Subject: Proposed rezoning P20SP00002 RIVER HOUSE TRUST, ET AL.
Date: Monday, January 24, 2022 7:27:32 PM

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

January 24, 2022

Greetings Pima County Zoning Commission,

River Estates Homeowners come forward to present their concerns regarding the proposed development project titled *Endeavour*. Homes in our neighborhood lie just beyond 300' due north of the project location.

Our residents collectively certify that not all property owners were mailed any notice of request to waive the subdivision platting requirements for rezoning per the *PLANNING AND ZONING COMMISSION POLICY* established on March 31, 1999. As such, *Endeavour's* proposal to rezone should be dismissed by this Committee on procedural grounds alone.

Furthermore, *Endeavour's* Specific Plan establishes a wide, nonspecific range of 45-66% increase in watershed runoff on the significantly larger Parcel A. See Specific Plan at II-24. Special Area Policy S-2 is established to protect the unique environment transitioning from highlands into the Rillito River. Such a drastic increase would plausibly impact the ecology of the area, but no subject matter expert of ecology has been consulted in *Endeavour's* Specific Plan for plant and animal impacts, nor is there any direct reference to any of Pima County's Regional Flood Control District Regulated Riparian Habitat Mitigation Standards and Implementation Guidelines for the Hydro/Meso Riparian Habitat in our area. The Specific Plan also fails to present any subject matter expert establishing that all soils were disturbed prior to 2001, and the only existing environmental report was performed on parcels 109-26-005L and 109-26-005M which are not part of the Specific Plan. See Id., Appendix A, page 1. These environmental oversights require disclosure, research, and certified plans directly from subject matter experts before Committee approval can be obtained.

In addition, *Endeavour* asserts that they will be modifying water mains made of asbestos without providing any mitigation plan for users sharing the supply, vaguely stating that, "Development of Parcel B requires attention to the existing water system and could require relocations and/or modifications depending on where new development areas occur and what water infrastructure is needed." See Specific Plan IV-37. Given the significance of potential asbestos impact to nearby residents, *Endeavour's* Specific Plan cannot move past this Committee without providing those potentially impacted with more specific awareness of proposed changes and possible risks.

Also, archaeological studies have not been performed as recommended by the Arizona Antiquities Act Administrator, let alone scheduled. See Specific Plan at IV-43. The Committee's approval should not be granted without this study at least being scheduled, if not performed fully and analyzed by the Arizona Antiquities Act Administrator.

Beyond this, *Endeavour's* estimate of increased traffic density does not appear accurate. We are informed that the potential of nearly 500 "active" users going to and from this site means that this report should increase additional volumes instead of simply using the lowest traffic generating category possible under the Institute of Transportation Engineers for a retirement community. See Specific Plan II-21 and 36. Even with these underrepresented volumes, the Craycroft and River intersection Level of Service will decrease below the City Capacity limits of D into failing E and F conditions. A geometric mitigation is not shown and should be recommended and provided at Craycroft and River as part of this project.

The Specific Plan's proposed driveway median exiting on to northbound Craycroft is poor mediation that is rarely obeyed by users, and a cheap mitigation for a fundamental safety risk that should be replaced by a full center median on Craycroft. Traffic exiting *Endeavour* is then forced onto southbound Craycroft, and the increased traffic volume consequently increases safety concerns through the crosswalks of walking students and turning parents into the Gregory school. Exiting traffic seeking a northbound route on Craycroft is then forced into a U-turn that is geometrically impossible and unsafe at the current configuration of the Gregory school entrance. At literally every turn, the proposed traffic plan by *Endeavour* is untenable.

A report from the state Attorney General suggest that reports of elderly abuse have increased 150% over the last decade, and authorities estimate that the number of abuse cases that are reported represents only 25% of the cases that actually occur. Such predators seek natural access and visibility into our surrounding communities. River Estates Homeowners, per attached list, are not interested in increasing crime rates within the community and ignoring Special Area Policy S-2 in exchange for strictly private benefit that only adds risk to our community.

Endeavour's Specific Plan provides topography for the residential area beyond 300' to the northwest of the project, but conspicuously ceases to convey the lower elevations to the northeast of their project in their exhibits. See Specific Plan at IV-46 and 47. Our records inform us that the larger structures planned for *Endeavour* are expected to exceed 50' above the existing grade of 2460'. See Id., I-11 and II-2. The homes in River Estates, at East Camino Rio de Luz Road sit at an average

elevation of 2500' constituting 40' differential in elevation, and the homes at North Camino Rio Soleado sit at an average elevation of 2490' constituting 30' differential in elevation, so 50' structures established by *Endeavour* will eliminate the views established for the exact purpose of Special Area Policy S-2. While *Endeavour* purports that, "The higher buildings are concentrated in the *center* of *Endeavour* to mitigate the visual impacts," (emphasis added; see I-11 of Specific Plan), the placement of eight (8) 50' tall structures in the center of our vista will materially impact our panoramic territorial view that taxpayers in this region expect to retain as a natural benefit of buying within Special Area Policy S-2. Furthermore, no prospective renderings were shown at the neighborhood meeting held on January 10th, 2022. As such, Homeowners requests that this Commission and the Board of Supervisors exercise their right to limit construction to 24'.

Additionally, the attached names of River Estates homeowners disagree with the topography shown, and make particular note that the drawings are *not stamped by any engineer registered to the state of Arizona*. See Id., IV-8. Approval from this Committee cannot proceed without presenting both our Homeowners and the Committee a Specific Plan that includes the appropriate subject matter experts certifying the viability of *Endeavour's* meeting basic local requirements.

In closure, *Endeavour's* Specific Plan should be denied on procedural grounds alone for a failure to mail notifications to required property owners within the subdivision. *Endeavour's* Specific Plan lacks economic and ecological proposals in their entirety; hydrology and archaeological studies and mitigation plans; increases transportation impacts and safety risks; and admits to blocking the center of our neighborhood's view with plans for 50' structures that deceptively omit the topography of our land to the immediate north. Not only can a commission approval not take place at today's hearing with such a lack of critical information being provided by *Endeavour* in their Specific Plan, but these River Estates Homeowners also urges this Committee to establish the denial of any zoning modification at this location beyond the established requirements of Special Area Policy S-2 due to the multitude of negative impacts exposed in today's hearing.

Respectfully,

Signed

Name: GUTIERREZ FAMILY REVOC TR

Parcel ID: 109231040

Address: 3714 N CAMINO RIO SOLEADO

Name: TAPIA-GUTIERREZ TR

Parcel ID: 109231050

Address: 3696 N CAMINO RIO

Name: MAYER OSCAR R & GUADALUPE M FAMILY TR

Parcel ID: 109231060

Address: 3688 N CAMINO RIO SOLEADO

Name: MANN TERRY A & MARJA L REVOC TR

Parcel ID: 109231070

Address: 3674 N CAMINO RIO SOLEADO

Name: VIETOR GRETA MARIA TR

Parcel ID: 109231080

Address: 3644 N CAMINO RIO SOLEADO

Name: MALDONADO FAMILY REVOC TR

Parcel ID: 109231100

Address: 3624 N CAMINO RIO SOLEADO

Name: KARP NAOMI

Parcel ID: 109231120

Address: 3600 N CAMINO RIO SOLEADO

Name: LIZARRAGA MARTIN B & DE JESUS RODRIGUEZ

Parcel ID: 109231130

Address: 3607 N CAMINO RIO SOLEADO

Name: ERNESTO & PIA FAMILY TR

Parcel ID: 109231140

Address: 3615 N CAMINO RIO SOLEADO

Name: VAUGHN TR

Parcel ID: 109231150

Address: 3623 N CAMINO RIO SOLEADO

Name: SUNSHINE IRREVOC TR

Parcel ID: 109231170

Address: 3639 N CAMINO RIO SOLEADO

Name: HERNANDEZ G DAVID & GRAZIELLA M CP/RS

Parcel ID: 109231180

Address: 3647 N CAMINO RIO SOLEADO

Name: PINEDA-MENDI JAVIER ANTONIO

Parcel ID: 109231190

Address: 3655 N CAMINO RIO SOLEADO

Name: KELLOGG EUGENE & AURORA LIVING TR

Parcel ID: 109231210

Address: 3671 N CAMINO RIO SOLEADO

Name: SAEED MUHAMMAD & RAINA DURRE MUBIN JT/RS

Parcel ID: 109231220

Address: 3679 N CAMINO RIO SOLEADO

Name: KINGSLEY JEFFREY S & MARY E JT/RS

Parcel ID: 109231230

Address: 3687 N CAMINO RIO SOLEADO

Name: ANTRIM SUSAN C & RAGAN JAMES E CP/RS

Parcel ID: 109231240

Address: 3695 N CAMINO RIO SOLEADO

Name: RHINE DANIELLE CP/RS

Parcel ID: 109231260

Address: 5362 E CAMINO RIO DE LUZ

Name: BOOKER KAREN Y & FOSTER CLARENCE CP/RS

Parcel ID: 109231270

Address: 5350 E CAMINO RIO DE LUZ

Name: FERNANDES FAMILY LIVING TR

Parcel ID: 109231280

Address: 5338 E CAMINO RIO DE LUZ

Name: CONNOLLY MICHAEL J JR & BAE SOUNGWON S

Parcel ID: 109231290

Address: 5326 E CAMINO RIO DE LUZ

Name: SALINERO DE VICENTE ESTEFANIA

Parcel ID: 109231300

Address: 5314 E CAMINO RIO DE LUZ

Name: MICEG TRUST

Parcel ID: 109231360

Address: 3777 N PLACITA RIO LUNA

Name: IMPERIAL ROCK SPRINGS LLC

Parcel ID: 109231370

Address: 3791 N PLACITA RIO LUNA

Name: ANDREN GEORGE W & ANDREN JANE H

Parcel ID: 109231380

Address: 3798 N PLACITA RIO LUNA

Name: RITZ EDUARDO

Parcel ID: 109231390

Address: 3784 N PLACITA Rio Luna

Name: DE RITZ BERTHA

Parcel ID: 109231410

Address: 5363 E CAMINO RIO DE LUZ

Property locations of signatories are shown below.



Sent from my iPad

REFERENCE TO CASE #P20SP00002 RIVER HOUSE TRUST, ET AL - N. CRAYCROFT
ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT

My home is at 3642 N. Camino Blanco Place, Tucson, Arizona, 85718. My family has lived on Camino Blanco Place since 1970. We chose this area because of the quiet remote feeling....a sandy road in the lower foothills. The area still attracts coyotes, bobcats, javalinas, an array of desert and riparian birdlife and small mammals.....a wildlife corridor. We have never had street lights in this area and Camino Blanco Place and Riverhouse Road still become flowing washes during monsoon season. We like it this way, rare in the foothills.

The proposed development plan is not in keeping with the surrounding rural residential community and existing zoning, and will be highly destructive to the natural riparian flood plain along the Rillito River and to the established low density quality of life we have in this area.

We are all concerned about the proposed zoning changes on the two properties south of us and contiguous to us. Zoning changes and the proposed development of Parcel A would change that property to a high density zone, reflected by the proposed 10 dwelling units per acre (approx.) The zoning change for Parcel B would increase the density there to 2-3 dwelling units per acre (approx.). Along with density increase come the multiple impacts on this environment of increased noise, exhaust, ozone, safe egress and ingress. residential traffic, ambulance sirens, delivery vehicles, garbage trucks, night lighting, wildlife loss and inevitably, unsustainable higher water usage because of more development.

We must look beyond the bubbles we live in, look beyond the county tax bases and incentives and look at the latest data, the big picture of our environmental situation. Water availability, unmanaged higher density growth in an already drought prone SW desert seem at odds with one another.

Drought measurements in the SW and along the Colorado River system are parched and worsening. In 2022 we are faced with a Tier 1 water restriction and already farming operations and urban dwellers are vying against one another for water allocations. Tier 2 water restrictions are a real possibility in 2023 with drought figures not improving in the Rocky Mountains, and water levels precipitously low in the two largest western reservoirs in the US, Lake Powell and Lake Mead.

But the demand for water continues and grows, so development plans that hike density and ignore the fact that water availability is an enormous consideration in the American SW, seem analogous to putting our heads in the sand. Six months ago Lake Mead was dropping one foot each week. Lake Powell has declined to 34% of full capacity. Officials from seven states that depend on the Colorado River water are preparing to negotiate new rules for managing shortages after 2026. Already, the **Bureau of Reclamation is providing up to date information to representatives of these states to communicate what they are seeing, what is going on, so everyone can act proactively.** In 2019, a **Drought Contingency Plan** was signed that is basically a short term fix for water shortage sharing, **a compromise of shared cutbacks.** In this agreement **Arizona receives 500,000+ acre feet less water from the Colorado River.** Thus, more water will have to be taken from ground water, from the aquifer, a finite resource.

We are facing an epic water shortage, and in this region, an environmental crisis if we are not careful. So, the inevitable question is what is the rationale for increased pressure on this finite

resource, what is the contingency plan? We seem to be barreling forward without acknowledging the long term impacts, the sustainability of projects, the decimation of natural environments or the over usage of natural resources. Surely, we must take a long view of development, its impact on our dwindling resources, its impact on the quality of life, and come up with more viable solutions.

Another issue is this, how many independent/assisted living/senior retirement complexes already exist in the Tucson area, and how many are needed? When last I checked there are over 100, approximately half of those complexes having over 100-200 dwelling units. Perhaps a study might be in order to find out what the actual occupancy rate is, how financially viable they are, are they all rentals and with what monthly cost per habitation unit, and undoubtedly they are an income boon to the corporations that own them. How sustainable are they and what happens to the zoning when they are no longer viable to the owners as an assisted living community? So perhaps the question is, "is it worth destroying a natural riparian habitat for a corporate owned apartment complex, when we currently have over 100 such complexes in the Tucson area?" We already destroyed a natural riparian heron rookery just east of Craycroft at the Rillito River, several years ago. That developer applied to and received a zoning change from the county, and then proceeded to construct an apartment complex of 216 dwelling units on 7.8 acres, a density of over 27 dwelling units per acre. That area is now over run with congestion and traffic from an overly dense housing complex, a school where parents pick up and drop off their children to the tune of hundreds of car trips per day, and along with that a commercial retail business area has been developed. The traffic issues there have never been addressed and it is a dangerous area for traffic ingress and egress.

All of the above mentioned impacts of the proposed zoning change deserve expanded discussion. It is important to us to retain the existing zoning and density. For-profit high density housing projects don't have to be developed on rare river frontage. Would it not be possible to find a more appropriate use of this land, one that would enhance the riparian Rillito River area? It is a beautiful natural corridor, let's not destroy more of the small amount of river frontage that remains in and around Tucson. Thank you.

Ann Slauter (land owner)
3642 N Camino Blanco Place
Tucson, Arizona 85718

Mary Puller
3642 N Camino Blanco Place
Tucson, Arizona 85718



1137 N. Dodge Blvd.
Tucson, AZ 85716
www.watershedmg.org

January 25, 2022

Re: Envisage – P20SP00002, River House Trust, et al.-N. Craycroft Rd Specific Plan and Comprehensive Plan

Dear Pima County Planning Commission Members:

On behalf of Watershed Management Group and our thousands of supporters throughout Pima County, this letter highlights our concerns and objections to the proposed rezoning of P20SP00002 River House Trust, et al. – N Craycroft Rd. We are familiar with the area of the proposed development, and have carefully reviewed the proposed development plans and staff feedback.

As you know, our region is facing more severe and longer lasting droughts that will impact our local groundwater resources, increasingly intense rainfall events that deliver damaging floods downstream, and increasing urban heat stress. To mitigate the impacts of these events on Pima County's communities and create resilience for the climate challenges that lie ahead, it is incumbent on us to preserve, reclaim, and steward our floodplains and riparian forests.

Floodplains and their forests (i.e. mesquite bosques) are critical to absorbing and dissipating downstream flood impacts. They support the recharge of groundwater that our county so desperately needs, and they also provide cooling corridors as they flow through our urban community.

This proposed development would occur largely within the 500-year floodplain of the Rillito River, a fair portion of which is classified as an Important Riparian Area and a Biological Core Management Area under its Conservation Lands System. This area is also part of the Sabino-Tanque Verde shallow groundwater area, which provides renewable groundwater supplies to our larger general aquifer and supports critical remnant riparian forests.

Additionally, The Santa Cruz Watershed Collaborative¹—of which there are over 35 listed partners including Pima County—highlights in its Watershed Restoration Plan the need to

¹ Source: <https://sites.google.com/site/santacruzcollaborative/partners>

“Preserve and restore floodplains to enhance infiltration and riparian habitat” as an identified strategy to “Replenish Shallow Groundwater Areas and Protect Riparian Habitat” (pg 51)².

The Watershed Restoration Plan also highlights the need to “Promote protection for priority lands and water” by “Designat[ing] a protected riparian area for the Pantano, Tanque Verde, Rillito confluence area to protect the natural floodplain features, protect and enhance shallow groundwater, and provide resources for riparian restoration” (pg 56)³.

We also want to bring to your attention the presence of seasonal surface flows in this area, which extend down past Craycroft Road. WMG’s community science Flow365 program monitors flow presence in our creeks and rivers across our watershed. From October 2020 to September 2021, our volunteers recorded a total of 83 days of flow on the Rillito at Craycroft Road, with 56 days of consecutive flow during the summer season. In spring 2019, our volunteers recorded 50 days of consecutive flow. Even during the record dry year of 2020, there were 21 consecutive flow days at this location.⁴ These flows are at risk of being lost without shifting our land use and management and better stewarding surface and groundwater along our floodways.

In addition to recommending denial of P20SP00002 River House Trust, et al., we request a pause on any rezoning requests for parcels in and along riparian areas on historic or current floodplains in the interest of preserving and enhancing our community’s climate resilience and overall community health.

WMG is grateful for Pima County’s leadership on working to integrate land and water resource issues, including the Sonoran Desert Conservation Plan, 2015 Design Standards for Stormwater Detention and Retention, and partnership and guidance in the development of the Santa Cruz Watershed Collaborative’s Watershed Restoration Plan. However, we simply cannot simply continue to move development forward as status quo without fully considering the link between land, water resource planning, and community climate resilience.

Thank you for your consideration of our concerns as we work to preserve our historic floodplains and riparian areas as a form of climate resilience to mitigate flooding, groundwater shortages, and urban heat stress.

Sincerely,



Catlow Shipek

Co-founder and Policy and Technical Director, Watershed Management Group

² Source: <https://sites.google.com/site/santacruzcollaborative/plan-resources/plan> (v2.2)

³ Ibid.

⁴ Source: WMG’s Fall 2021 Newsletter, <https://watershedmg.org/document/2021-fall-newsletter>

Date: 1/23/2022

Subject: Notice of Zoning- P20SP00002 RIVER HOUSE TRUST, ET AL. N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT and **Registration of My Strong Opposition to that.**

Greetings,

This is Dr. Abdolmajid Kabiri Khalajzadeh, the owner of the property at **3533 N Craycroft Rd., Tucson, Az 85718.**

Per this email I would like to register my strong opposition to the rezoning of my immediate neighborhood. A couple of unscrupulous neighbors for the sake of profits want to commercialize our peaceful neighborhood. This is the continuation of the same efforts which they started almost 3 years ago trying to change our status from the Pima County to the City of Tucson (They approached the City of Tucson without telling their intention to their neighbors, an un-neighborly act) in order to have more degrees of freedom of accomplishing their scheme, through the manipulations and abuse of the City of Tucson systems, which is more relaxed in comparison of the County. But, they failed. Now, through their lawyer, and some developers whose identities are secrets and unknown to the neighbors, they have resumed the same Hanky Panky under the veil of the "Envisage Living Communities." Only a gullible will consider this scheme anything but the constructions of boxes for Sardining Senior Citizens*.

If they succeeded in their scheme, the second Pandora box will be opened in our neighborhood. The first one was the construction of 210 units of ugly cramped apartments in a very small area by the developer Mr. Caesar (May be spelled differently) on the East side of Craycroft (East of the Chase Bank,) along the future Tanque Verde Wash loop, 3510 N Craycroft Rd. Tucson, AZ 85718, which is the mockery of the Pima County's Motto of free space/space for living. There is a high probability that the same developer(s) are secretly part of this scheme too... I called it mockery because Pima County solicits donations for the keeping of the free spaces of the county but at the same time let the construction of 210 units of ugly cramped apartments in a very small area to become a reality for the eyesores of the neighbors and those who use the loops. Not only that, it is a great source of ozone pollutions in the summer when the Nitrogen Oxides of the car's emissions exposed to the sun rays! A great source of pollutions next to the loop!

Please make this process transparent** by raising the veil over the shadowy developer(s) and all the parties behind this scheme and their track records in our city, specially their involvement in the constructions of those ugly cramped apartments which had destroyed a beautiful open space in our beautiful and unique loop systems.

Currently a private access road which passes through my property create access to the four properties there, including access to two properties owned by the owner of PARCEL A, Greg

Hutchison. The acreage of my property includes the areas of this private access road where passing through my property. Under no circumstance I will let any changes in the current status of this private access road. If Pima County approved the project against my strong opposition to that, my property will be the worst affected among all the neighbors by this project. Therefore, I must be compensated for all pollutions and any other adverse effects as a consequence of the approval of this project which will be inflicted upon my property.

The owner of PARCEL A Project, Greg Hutchison (or some shadowy developer(s)) has (have) envisioned to create a public road to his project at a short distance from the southern boundary of my property passing through the leach fields of the Park's Toilets and connect PARCEL A project to the Craycroft Rd. This area belongs to the Park, hence it is the Pima County Property. Has this matter brought to the attention of the Pima County? If yes, has Pima County agreed with that? If yes, it means that the owner of PARCEL A Project will be the recipient of two big concessions from the Pima County. The first one was when the County gave Mr. Don Schroeder the previous owner of 3475 N. Craycroft Rd., a substantial amount of the County's lands free of any charges, and the County on its own expense erected the walls for the lands transferred to Mr. Don Schroeder. After Mr. Schroeder property was bought by Greg Hutchison, Greg became the final recipient of this great gift. Now he wants to add to that a new land grab from the County which is the leach fields of the Park's Toilets. Is County aware of that? If the rezoning project being approved by the county, the creation of this public road south of my property and extremely close to that will create a great source of pollutions, vandalisms, and many other nasty things in my property, and my property will be the worst affected among all the project neighbors. If the project approved by the county, against my strong opposition to that, the county must compensate me for the damages which will be inflicted upon my property. As part of this compensation, the county must award me the lands between the Northern boundary of this public road and the most southern boundary of my property to create a buffer between this road and my property. And the County on her expense, must erect a wall to separate my property from this public road as she did it for Mr. Don Schroeder many years ago.

Respectfully,

Dr. Abdolmajid Kabiri Khalajzadeh, a concerned neighbor

Abdolmajid Kabiri

CC: Pima County Board of Supervisors

*

a - When Greg Hutchison, the owner of the PARCEL A (according to the map accompanying their lawyer's letter dated December 27, 2021) purchased Mr. Don Schroeder property, located at 3475 N Craycroft Rd. Tucson, AZ 85718, I asked him what is his plan for the property. His answer was to make a Center for the Rehabilitations of Heroin Addicts there.

Then the plan became to create nursing homes for the aged there. A little after, it became a place for development of Apartments for the low income people there, according to his Tennent. And now **Luxury Sardining Boxes for the Senior Citizens.**

**

- 1- In the Monday, January 10th meeting organized by their lawyers Lazarus & Silvyn, I asked them explicitly whether Mr. Caesar has any function in this project. Their answer was he has no function in this project! The county must tell us who are behind of this shadowy and opaque project.
- 2- The emphasis of their lawyers was that an important part of PARCEL A project is the creation of Green Space and Planting Trees by the project. In response of my question that if that is the case why Greg Hutchison the owner of PARCEL A cut almost all the trees that Mr. Don Schroeder the previous owner of 3475 N. Craycroft Rd. had planted there during his past 60 years of residence there? Their answers was that they do not represent Greg (Hutchison!) It is also probable that PARSEL A had already be transferred or sold to its developer(s). Some Hanky Panky is going on. Who are the shadowy figures behind this project! The Pima County must tell us about these actors and make the process transparent.
- 3- The Pima County Procedures set forth for the rezoning process is being abused by their lawyers as a cursory means for the sake of formality, and fulfillment of the procedures, rather than as a forum for the discussions of the neighbors concerned in the matters of rezoning. Despite my frequent requests to address the audience, they did not allow me to do so in the Monday, January 10th meeting.
- 4- It seems that the main property of Greg Hutchison will be subdivided. He will keeps his home on the northern part of his main property and the southern part of his property will become part of PARCEL A project. There is no indication of the zoning for the northern portion of his property. In neither their lawyer's letter nor its accompanying map nor on the notice of Pima County for Rezoning, no indication is given for this sub division activity and its subsequent zone after the subdivisions, which must be cleared out by the County and brought to the attentions of the neighbors.
- 5- Projects like "Envisage Living Communities" usually are clustered around the existing hospitals, like the FORUM of Tucson and many others like that which are clustered around the Tucson Medical Center. If the plan A is approved by the county, the next thing they want to create are a hospital, funeral homes, beds and breakfasts for the guests, restaurants, hotels, and many other supporting businesses to support the project... Tucson is extremely hot in summer. The car emissions from this project exposed to the sun rays in the summer can create a tremendous amount of ozone pollutions in this area! Are you ready for that?

- 6- The owner of PARCEL B project claims that the entrance to his project B will be from the River Rd., and **NOT** from the road which connects project A to the Craycroft Road. But, when it is rezoned (commercialized,) with very high probability he will submit an amendment to have access to the road which connect Project A to Craycroft Road. Because Project B due to its distance from the River Road, and also due to the nature of the River Road, where there is no commercial activity, and its narrowness, a commercial entity cannot be viable through an access road from the River Road. Therefore the only solution for that will be the use of an already available road which connect project A to the Craycroft Road... Therefore, I alone must be the miserable sufferer of all nasty consequences of Project A and Project B combined.

Commissioners
To the Members of the Zoning Board,

I would like to oppose the proposed rezoning and the entire project on River Rd for the following reasons:

1. The current traffic on River rd is very heavy at several times during the day - residents like myself, have to wait over 5 minutes just to make a right hand turn. Many of us have no exit from our developments except onto River Rd. or Craycroft.

2. Also, regarding what already exists- there are multiple driveways from housing, from the 2 shopping centers on the corner of Craycroft and River and from Basics School- all off which face each other. So just to turn right a driver must look left, then across the street to see who is coming to go left and at the median as well, where people are doing u-turns also. It's already a prime example of bad planning.

3. So- How could you possibly consider adding 200 living units, 3 story buildings (which will block views and open sky from the Loop), a 22 lot residential sub-division, a country club, a lecture center, and a wellness center on top of this??

The area can not support more traffic and more people. *Why would we try to wedge in more development?*

4. And MORE importantly- The Loop, which is a beautiful asset to our community already doesn't have enough parking during many months of the year- and it will be over run by hundreds of additional people. This developer is treating The Loop as a draw to their development!

5. An airstream food service???? The Loop does NOT need to be commercialized- this is a nature trail NOT Disneyland.

6. Our taxes paid to build the Loop and now you are taking an asset of our community and using it to draw more people into an already crowded area -

So essentially something we created with our money is going to be destroyed for private corporate gain.


7. The Loop and its surrounding acreage are important wildlife habitat- and it is this beauty that makes our area so special- if you develop it you are destroying the very thing that people value about living in the foothills.

8. Tucson is growing and when we expand we need to do it in a way that does not destroy the very thing people love about it!

So- please, do not rezone this property- this is not the right location for a big project AND it's morally wrong to burden a neighborhood and destroy a habitat to accommodate a corporation when the community has SO MUCH to lose and absolutely NOTHING to gain!

Thank you,

Valerie Policastro Edie
5920 E Verde Pl.
Tucson, Az 85750



January 24 2022

Pima County
Development Services Department
201 N Stone Ave
Tucson, AZ, 85701

**RE: Case P20SP00002, River House Trust, Et Al –
N. Craycroft Road Specific Plan and Comprehensive Plan Amendment**

We write to *Object* to the proposed rezoning and development of the property at Craycroft Road, "The Loop", and the adjoining Camino Blanco neighborhood.

We are in the process of purchasing the land of 3602 Camino Blanco Place. We have signed a contract as of December 20 2021 and just learned of this proposal on Friday January 21, 2022.

3602 Camino Blanco Place is within 300ft of the proposed zoning change request. This Project will have significant impact on our future home.

We have interest in this property to build our home because of the rural atmosphere of the neighborhood, the wildlife and natural vegetation in the surrounding area. The current zoning prevents high density and supports the natural setting.

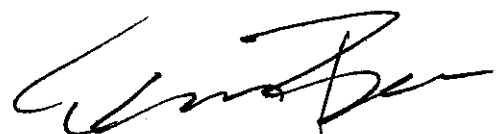
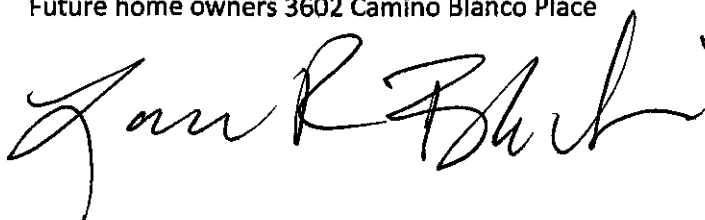
The proposal plans would change all that by introducing dense housing in Parcel A and much taller and even denser housing in Parcel B. The increased population that the Project proposes will inevitably increase area traffic as well as water and utility usage. It overwhelms the current rural neighborhood atmosphere, endangers the animals and vegetation of the natural riparian area. Additionally, the proposed development is partially within a flood zone. This will inevitably require additional flood prevention construction along Rillito Creek, ugly and currently unnecessary, to prevent the development from flooding. Do we really want our waterways to end up looking like the massive and trash-filled concrete "ditches" of Phoenix, just to squeeze a few more dollars out of marginal land?

According to the Specific plan, one issue of note is under Cultural Resources. The Arizona State Museum is already recommending that the 'Property' of Parcel A be resurveyed before ground disturbing activities since an archeological site was identified over 10 years ago. The threats to the cultural and the natural area are real and extreme.

While development is inevitable as populations change, this proposal obliterates a current neighborhood and natural open space resources in favor of commercial development. We advise a more balanced approach that allows for development while observing the existing zoning.

We encourage the commission to reject this rezoning proposal.

Respectfully signed,
Laura Bloomenstein and Eric Boos
Future home owners 3602 Camino Blanco Place



January 17, 2022

Planning Commission and Board of Supervisors
c/o Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Endeavour Spirited Living Specific Plan

Dear Pima County Planning Commissioners and Board of Supervisors:

My family lives at 5302 E Camino Rio De Luz, in Fairfield River Estates, north of the proposed Endeavour Specific Plan (“Specific Plan”). I am writing to express support for the Specific Plan.

I attended the neighborhood meeting on January 10th and have had chance to review the plans for this project.

As someone who has worked in community and economic development in this region for my entire professional career, I am excited about this project and the investment it will bring to our community. As a neighbor, I believe this is the right project for this property.

The site for the project is located along the north side of the Rillito River west of Craycroft Road adjacent to the Loop. As proposed, it would include a natural buffer and significant elevation changes for the homes to the north, thus minimizing the visual and operational impacts to the homes in my neighborhood. The site also is a good distance from the nearby homes on the south and retail and residential uses to the east. Parcel B of the project provides a transition to the lower density homes to the north and west.

This project is consistent with development on both the north and south sides of the Rillito River from Oracle Road to Craycroft Road including retail, office, recreational, single- and multi-family residences and retirement and senior community uses.

After reviewing the project plans, I believe the developer has made a great effort to mitigate possible negative impacts of the project, including impact on the Loop by adding natural landscaping and physical buffers, as well as additional parking and a food amenity for users of the Loop.

While Parcel A use will bring additional traffic to Craycroft Road, the actual use – Senior Living – will produce less traffic than other possible uses for the site, including traditional apartment or residential developments. The developer seems committed to improving the access to the project site at Craycroft. I am particularly pleased to see the addition of a dedicated right-hand turn lane for traffic entering the site from the north on Craycroft. This will alleviate many of the traffic

conflicts that currently occur at the entrance to the Loop. I also support the proposal to require all traffic departing the site to turn right (south) on to Craycroft. This will eliminate possible conflicts with the flow of traffic to the north on Craycroft.

It is my understanding that the current property owner has consolidated this property for sale. As a result, it is highly unlikely that the property will continue in its current use. I believe of all the possible uses for this property, this is the right use. The project will result in a high-quality, well-designed development operated by a company respected in the field of senior living.

I recommend that you approve the Specific Plan.

Sincerely,

Bruce Wright
5302 East Camino Rio de Luz
Tucson, Az 85718

THE
Gregory School
*A Tradition of
Inspiring Excellence*

January 16, 2022

Planning Commission and Board of Supervisors
c/o Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Endeavour Spirited Living Specific Plan

Dear Pima County Planning Commission and Board of Supervisors:

I am Head of School for The Gregory School, which is located south of the Rillito River and the proposed Endeavour Specific Plan ("Specific Plan") project.

The developer of the Specific Plan and their representative, Keri Silvyn, reached out to me last fall to discuss this project and its potential impact on Craycroft traffic flow. As it has been described to me, the Specific Plan will require traffic exiting its property onto Craycroft to turn right (head south) and, if they ultimately want to head north, they will likely make a u-turn at the traffic light at The Gregory School entrance. Coincidentally, we had already been exploring possible improvements to The Gregory School entrance. As part of that process, we were reviewing the existing traffic lights and considerations relative to our proximity to the Old Fort Lowell neighborhood, so the details of the Specific Plan that we have been provided are now also taken into account in our discussions. We prioritize the safety of our students, families, employees and visitors when considering any campus improvements, and anticipate that Ms. Silvyn and the developer will do the same and will work with The Gregory School and other neighbors to mitigate any concerns we may have about affected traffic patterns. In our conversations thus far, the development team and Ms. Silvyn have listened to concerns and responded to questions we've posed, so we hope that positive relationship will continue and may even ultimately result in opportunities for members of The Gregory School to collaborate with residents of the development through intergenerational programming.

At this point I am optimistic that this Specific Plan project can be a win-win situation for all of us, and we look forward to working with the development team as this moves forward.

Sincerely,



Julie A. Sherrill, Ph.D.
Head of School
The Gregory School

January 11, 2022

Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Endeavour Spirited Living Specific Plan

Dear Development Services Staff:

We live at 5468 E. River Road, less than 400 feet from the proposed Endeavour Specific Plan ("Specific Plan"). Parcel A project. We are writing to express support of the project.

From our discussions with the applicant's representatives at Lazarus & Silvyn, we understand that the proposed use will generate less traffic than a traditional apartment complex. Even with less traffic, the project team is working to improve traffic circulation and make it safer along both Craycroft Road and the access drive through County property to the project. Making a left-hand-turn from the driveway onto Craycroft is already difficult and unsafe during the busiest times of the day. Although it will be less convenient, we are supportive of the project team's proposal to require vehicles to turn right onto Craycroft, as long as improvements are made at the Gregory School traffic signal to allow people to make a U-turn so they can travel north on Craycroft. We also appreciate Ms. Silvyn listening and working to incorporate additional traffic calming efforts within the parking lot and other efforts to make this area safer for vehicles, pedestrians, and bikes for those who live there and will be visiting.

We believe the Endeavour community will be a good neighbor, and the neighborhood will benefit from the investment in this property. We are happy to support this request. We urge you to approve the Specific Plan.

Sincerely,

Eleazar and Claudia Beltran

A handwritten signature in dark ink, appearing to read "Eleazar Beltran", with a long horizontal line extending from the end of the signature across the page.

RIVER CRAYCROFT HOLDINGS, L.L.C.
P.O. BOX 12862 Tucson, AZ. 85732
(520) 747-5700 Office.
(520) 577-8555 Fax.

January 16, 2022

Planning Commission and Board of Supervisors
c/o Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Endeavour Spirited Living Specific Plan

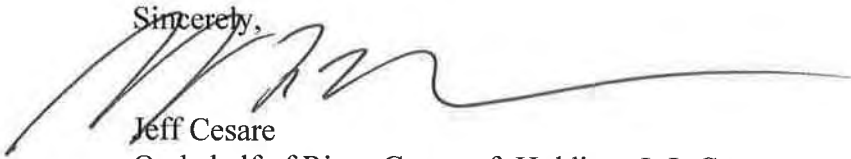
Dear Pima County Planning Commission and Board of Supervisors:

I represent River Craycroft Holdings, L.L.C. ("RCH"), which is a family-owned business that has developed both the southeast & north east corners of River and Craycroft. In addition, our family also lives just south and east of that intersection. I am writing to express support for the Endeavor Spirited Living Specific Plan ("Specific Plan").

As a long time, developer in Tucson & Arizona, & long-time resident in this area, I am excited to see the investment and thoughtful development. This proposal and use is on a large parcel that has natural buffers due to the adjacent hills, the Rillito and the Loop entrance. Active Senior Living is a great addition to this area as it is a lower traffic user. And the additional amenities for the Loop will be great to encourage Loop use in this area.

I am excited about this project and what it will add to the area and am very happy to support this request. I urge you to approve the Specific Plan.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Jeff Cesare', with a long horizontal flourish extending to the right.

Jeff Cesare

On behalf of River Craycroft Holdings L.L.C.

January 20, 2022

Pima County Planning Commission
c/o Mark Holden
Principal Planner Pima County

Re: ENVISAGE - P20SP00002, RIVER HOUSE TRUST, ET AL.-N. CRAYCROFT ROAD SPECIFIC PLAN AND
COMPREHENSIVE PLAN

Dear Commissioners:

Our home is located at 5225 E River House Road. It is located directly adjacent to the Envisage Parcel A and overlooks that property as our primary view shed. The applicant for Parcel A has worked with us to mitigate our concerns for the property. As such, we are submitting this letter to voice our support for the applicants request for Parcel A as submitted currently.

Sincerely,

Two handwritten signatures in black ink. The first signature is a stylized 'J' followed by a series of loops and a horizontal stroke. The second signature is a stylized 'K' followed by a series of loops and a horizontal stroke.

James and Kathleen Hardman
5225 E River House Road

January 21, 2022

Planning Commission and Board of Supervisors
c/o Pima County
Development Services Department
201 N. Stone Ave.
Tucson, AZ 85701

RE: Endeavour Spirited Living Specific Plan

Dear Pima County Planning Commission and Board of Supervisors:

I am a long-time resident of Tucson, live in the foothills, am a professional REALTOR, and a long-time advocate for the cycling community in the region. I have worked to help support the Loop, am on the board of the organization that brings the El Tour de Tucson to this region annually and self-subscribe as a community organizer. I love the Tucson region and am always striving to improve quality of life in this region. Wearing all of those hats, I support the Endeavour Specific Plan ("Specific Plan") project and urge you to approve this project.

I am excited about the Active Senior Living aspect of this proposal as a great complement to the Loop. I believe this is the right use tucked down below adjacent neighbors. The additional buffer and riparian vegetation that will be adjacent to the Loop in this area will only enhance the experience for Loop users as well. As an avid cyclist who uses the Loop, I am particularly excited about the investment the developer is making in the additional Loop amenity. It can be hard to establish nodes along the Loop for users to enjoy snacks/coffee and other community spaces because those are risky ventures if people other than Loop users cannot access. This is a unique proposal in that it encourages the Active Senior Adult community to engage in this area along with Loop users or even participate as actual Loop users to complement those already using the Loop. The improvements and expansion to the parking area for the Loop, safety improvements to the access point and even the connection of the bathrooms to the sewer system are all added benefits.

I am personally (and wearing all of my hats as described above) excited about this project and what it will bring to the region. I urge you to support and approve the project.

Sincerely,

Damion Alexander