

July 26, 2022

Supervisor Sharon Bronson, Chair
Pima County Board of Supervisors
130 West Congress. 5th Floor
Tucson, Arizona 85701

(Transmitted by email)

Case#: P20SP00002 – Support for N. Craycroft Road Specific Plan and Comprehensive Plan Amendment

Dear Supervisor Bronson:

On Tuesday, August 2, the Board of Supervisors will consider a comprehensive plan amendment and specific plan rezoning for the River House Trust North Craycroft Project. I support this project and urge you to approve the plan and rezoning request.

I live in River Estates, which is neighborhood to the immediate north of the project site. My house is located at the southern edge of our neighborhood and has direct view into the project site.

I have carefully reviewed this project including the project plans. I attended one of the public meetings on the project and participated in the developer's meeting with my neighborhood association. I have also met with the developer.

I support this project for several reasons:

- (1) This is a high quality, well designed, low impact project that is consistent with the kind of development in and around Craycroft and River Roads. The architectural design is attractive and compatible the architecture of the adjacent residential and commercial uses in the area.
- (2) I have spent 40 years of my professional life in the field of community and economic development and have served on the boards of GTEC, Imagine Greater Tucson, and the RTA Citizen's Advisory Committee. A persistent goal of those organizations along with the City of Tucson and Pima County, has been to promote and incentivize infill development that would reduce urban sprawl, take advantage of existing infrastructure, and promote the use of public transportation. This is just such a project.
- (3) The prospective owner/operator of this project is a company respected in the field of senior living. I have been impressed with the innovative concepts the owner/ operator has included in the project, both in the design of residential units and community

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COPY TO SUPERVISORS
COUNTY ADMINISTRATOR

DATE 7/26/22 alw

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facilities. As the chair of the Board of the Arizona Senior Academy, I have also been impressed with the innovative elements of the operating plan including a focus on senior wellness, life-long learning, and community engagement.

- (4) The developer has made a serious effort to mitigate any possible negative impacts of the project on the surrounding area including addressing site access and traffic, wildlife corridors and habitat, enhancement of riparian/CLS areas and view corridors. The developer has also been responsive to concerns raised by the neighbors and has made a series of changes in the plan including reducing the number of units, lowering the height of units, and restricting access on the west side of the project to only emergency vehicles.
- (5) The developer also will take steps to minimize the impact of the project on the Rillito River Pathway (The Loop) by creating a wide landscape barrier along the pathway and revegetating the area with native species. The developer will also be adding parking for Loop users and improving road access to the parking lot. And finally, the developer has offered to install and operate an attractive food amenity for Loop users.

This property is in an urban area including two schools, apartment complexes, and a busy shopping center. There have been several projects previously proposed for this site. From my perspective as adjacent property owner, this is the best proposed use for the site. I hope you will approve the plan amendment and rezoning changes.

Bruce A. Wright
5302 East Camino Rio de Luz
Tucson, Arizona 85718

cc: Jan Leshner, County Administrator
Carmine DeBonis, Deputy County Administrator
Carla Blackwell, Director of Development Services

Pima County Board of Supervisors
c/o Clerk of the Board
130 W. Congress, 1st Floor
Tucson, AZ 85701

July 26, 2022

Honorable Members of the Pima County Board of Supervisors:

The majority of River Estates Homeowners Association members come forward to **OBJECT** the rezoning of P20SP00002, River House Trust, Et Al - N. Craycroft Road Specific Plan and Comprehensive Plan Amendment, to be named "*Endeavour*". The homes in our Homeowners Association lie just over 300' due north of the project location. The unique location of this project makes this a critical decision for not only Districts 1 and 4 due to the direct impacts listed herein, but also Districts 2, 3, and 5 will also feel indirect impacts of a decision to develop the environment in this proposed location and attract more commercially driven traffic.

When the Planning and Zoning ("P&Z") Commission Members met to discuss the *Endeavour* project in January, citizens across Pima County spoke with conviction and a unified voice to demonstrate unprecedented opposition to this project. As a result, the P&Z Commission wisely voted to **DENY** this project. The reasons for this denial included this project's proposing unprecedented commercialization of "the Loop", planning buildings over twice the Special Area Policy S-2 height restriction, identifying that the proposed A and B Parcels had no relation to each other in regard to zoning, and the lack of community support. The ultimate message from the P&Z commission materially amounted to, "*good Development, wrong area*". However, despite having 6 months to develop alternatives, Endeavor's developers have not moved away from this "wrong area", as it is key to their commercialization of "The Loop" by utilizing our scenic, multi-use public space for private business benefit.

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 Plan¹ at IV-46 and 47. The plans distributed to our HOA in January 2022 inform us that the larger structures planned for *Endeavour* are expected to exceed 50'. See Id., I-11 and II-2. The 50' tall structures established by *Endeavour* will eliminate the views established for the exact purpose of Special Area Policy S-2, which limit building heights to 24'. 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 three (3) 50' tall structures within 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. Even if *Endeavor's* developers present plans with their stated alternatives, these merely offer a few marginally reduced building heights. The proposed buildings still sit many feet above current zoning requirements, as well as above the Special Area Policy S-2 requirements which limit building heights to 24'. Our citizens' territorial view, purchased with understanding that Special Area Policy S-2 would be enforced by the County, would *still* be materially impacted. Endeavor developers purport that their changes are significant, but the modifications neither meet the changes requested by the public, nor local code in the proposed development area. **The majority of our homeowners maintain our request that the Board of Supervisors enforce Special Area Policy S-2 and to limit construction to 24'.**

¹ "Specific Plan" refers to Endeavor's plan issued to our HOA in January 2022. We have not formally received an updated plan since this time.

Attention Clerk of the Board: This letter is intended for distribution to all BOS Members as public comment to the P20SP00002 *Endeavour* item on the August 2 BOS meeting agenda. Please enter it into the public record.

**CLERK'S NOTE:
COPY TO SUPERVISORS**

COUNTY ADMINISTRATOR
CC: DSD: Chris Poirier & Donna Spicola
DATE 7-26-22cc

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Beyond this, *Endeavour's* estimate of increased traffic density does not appear accurate. We are informed that the potential of nearly 500 "active" users (354 residents, 50 staff members, 30 visitor parking stalls) going to and from this site means that this existing traffic 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, and fall into E and F conditions. **Endeavor's developers cannot proceed without generation of an acceptable geometric mitigation plan for traffic.**

Furthermore, the Specific Plan's proposed driveway median exiting on to northbound Craycroft has been shown by transportation engineering research to be poor mediation that is rarely obeyed by users. This is an unsatisfactory mitigation for a fundamental safety risk that should be replaced by a full center median on Craycroft. This solution was requested by multiple stakeholders at previous public meetings, but the Endeavor developer's continued efforts to ignore this safety request puts roadway users at huge risk. Traffic exiting *Endeavour* will be 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 will then be 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.**

Moreover, *Endeavour's* Specific Plan establishes a wide, nonspecific range of 45-66% increase in impervious area 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 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. *Endeavor's* plan avoids 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 approval can be obtained from the Board of Supervisors. **The developers for *Endeavor* cannot be permitted to proceed without meeting these fundamental requirements.**

In addition, *Endeavour* asserts that they will be modifying water mains made of asbestos without providing any mitigation plan for users sharing the supply. Its developers vaguely state 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 the Board of Supervisors without providing an asbestos risk mitigation plan to those potentially impacted.**

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 Board's approval should not be granted without an archaeological study at least being scheduled, if not performed fully and analyzed by the Arizona Antiquities Act Administrator.**

Penultimately, 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

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visibility into our surrounding communities. The majority of River Estates Association Homeowners 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.

Above all of the aforementioned concerns, what the majority of our community takes issue with is the lack of integrity from Endeavor's developers. Previously, Endeavor's developers made it clear to both our community and the P&Z commission that reduction in building heights and the costs required to making changes to meet traffic, hydrology, environmental, and archaeological requirements would make their project financially impossible. Yet these same developers still stand in front of both you and us today, claiming to have made significant changes that *Endeavor's* developers previously said would be impossible for their private asset. It is clear that *Endeavor's* non-resident developers will tell whatever narrative they need in order to maximize their capital asset or gain permission to build, without regard for local requirements that protect our county and its citizens. Fundamentally, the majority of our community no longer trusts *Endeavor's* developers – and ***we believe that you should not trust Endeavor's developers either.***

For these collective reasons, we urge the Board of Supervisors to heed the plea of this county's citizens, as well as honor the determination of the Planning and Zoning Commission's recommendation, to **DENY** this specific development and reaffirm to our communities that citizens' rights – not interests for private capital – continue to be the primary consideration for the Board of Supervisors.

Respectfully,

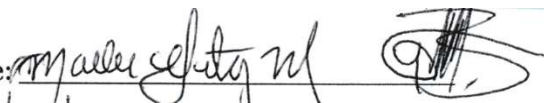
Hereby signed by the parties below in the city of Tucson, state of Arizona.

Signature: 

Name: GUTIERREZ FAMILY REVOC TR

Parcel ID: 109231040

Address: 3714 N CAMINO RIO SOLEADO

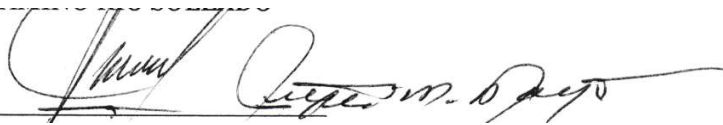
Signature: 

Name: TAPIA-GUTIERREZ TR

Parcel ID: 109231050

Address: 3696 N CAMINO RIO SOLEADO

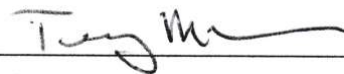
Hereby signed by the parties below in the city of Tucson, state of Arizona.

Signature: 

Name: MAYER OSCAR R & GUADALUPE M FAMILY TR

Parcel ID: 109231060

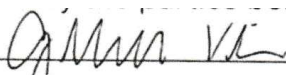
Address: 3688 N CAMINO RIO SOLEADO

Signature: 

Name: MANN TERRY A & MARJA L REVOC TR

Parcel ID: 109231070


Address: 3674 N CAMINO RIO SOLEADO

Signature: 

Name: VIETOR GRETA MARIA TR

Parcel ID: 109231080


Address: 3644 N CAMINO RIO SOLEADO

Signature: 

Name: MALDONADO FAMILY REVOC TR

Parcel ID: 109231100

Address: 3624 N CAMINO RIO SOLEADO

Signature: 

Name: LIZARRAGA MARTIN B & DE JESUS RODRIGUEZ

Parcel ID: 109231130

Attention Clerk of the Board: This letter is intended for distribution to all BOS Members as public comment to the P20SP00002 *Endeavour* item on the August 2 BOS meeting agenda. Please enter it into the public record.

Address: 3607 N CAMINO RIO SOLEADO

Hereby signed by the parties below in the city of Tucson, state of Arizona.

Signature: 

Name: ERNESTO & PIA FAMILY TR

Parcel ID: 109231140

Address: 3615 N CAMINO RIO SOLEADO

Signature: 

Name: SUNSHINE IRREVOC TR

Parcel ID: 109231170

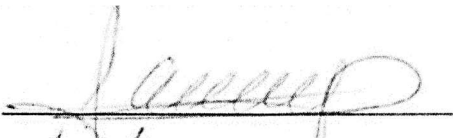
Address: 3639 N CAMINO RIO SOLEADO

David Kelly Hernandez
Signature: 

Name: HERNANDEZ G DAVID & GRAZIELLA M CP/RS

Parcel ID: 109231180


Address: 3647 N CAMINO RIO SOLEADO

Signature: 

Name: PINEDA-MENDI JAVIER ANTONIO

Parcel ID: 109231190

Address: 3655 N CAMINO RIO SOLEADO

Signature: 

Name: KELLOGG EUGENE & AURORA LIVING TR

Parcel ID: 109231210

Address: 3671 N CAMINO RIO SOLEADO

Hereby signed by the parties below in the city of Tucson, state of Arizona.

Signature: Durre Mubina

Name: SAEED MUHAMMAD & RAINA DURRE MUBIN JT/RS

Parcel ID: 109231220

Address: 3679 N CAMINO RIO SOLEADO

Hereby signed by the parties below in the city of Tucson, state of Arizona.

Signature: Mary E Kingsley & Jeffrey S

Name: KINGSLEY JEFFREY S & MARY E JT/RS

Parcel ID: 109231230

Address: 3687 N CAMINO RIO SOLEADO

Signature: James E Ragan Susan C

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

Parcel ID: 109231240

Address: 3695 N CAMINO RIO SOLEADO

Signature: Dan Rhine

Name: RHINE TIMOTHY & DANIELLE CP/RS

Parcel ID: 109231260

Address: 5362 E CAMINO RIO DE LUZ

Signature: Karen Booker & Clarence E. Foster

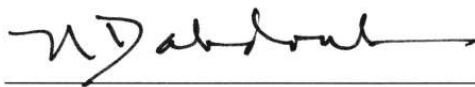
Name: BOOKER KAREN Y & FOSTER CLARENCE CP/RS

Parcel ID: 109231270

Address: 5350 E CAMINO RIO DE LUZ

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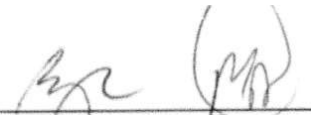
Hereby signed by the parties below in the city of Tucson, state of Arizona.

Signature: 

Name: FERNANDES FAMILY LIVING TR

Parcel ID: 109231280

Address: 5338 E CAMINO RIO DE LUZ

Signature: 

Name: CONNOLLY MICHAEL J JR & BAE SOUNGWON S

Parcel ID: 109231290

Address: 5326 E CAMINO RIO DE LUZ

Signature: 

Name: GOODRICH DAVID CHARLES & NITA KELLY BALISLE CP/RS

Parcel ID: 109231330

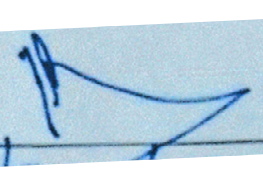
Address: 5337 E CAMINO RIO DE LUZ

Signature:  Enrique & Martha Gamiz

Name: MICEG TRUST

Parcel ID: 109231360

Address: 3777 N PLACITA RIO LUNA

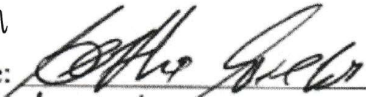
Signature: 

Name: RITZ EDUARDO

Parcel ID: 109231390

Address: 3784 N PLACITA RIO LUNA

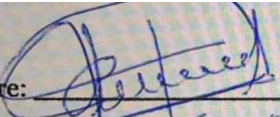
Hereby signed by the parties below in the city of Tucson, state of Arizona.

^{na}
Signature: 

Name: DE RITZ BERTHA

Parcel ID: 109231410


Address: 5363 E CAMINO RIO DE LUZ

Signature: 

Name: LICHTER JOSE ABRAHAM & PADILLA U NORA S JT/RS

Parcel ID: 109231200

Address: 3663 N CAMINO RIO SOLEADO

Signature: 

Name: IMPERIAL ROCK SPRINGS LLC

Parcel ID: 109231370

Address: 3791 N PLACITA RIO LUNA

Original Signatures On File

Corrie Cotugno

From: majid Kabiri <[REDACTED]>
Sent: Wednesday, July 27, 2022 7:47 AM
To: COB_mail; DSD Planning
Subject: P20SP00002 RIVER HOUSE TRUST, ET AL. - N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT.

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.

Date: 7/26/2022

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

Greetings,

This is Dr. Abdolmajid Kabiri Khalajzadeh, the owner of the property at 3533 N Craycroft Rd., Tucson, AZ 85718. The Project A of the PLAN (Scheme) is located in my immediate Southern Neighborhood.

Per this email I would like to register my strong opposition to the rezoning of my immediate Neighborhood per **P20SP00002 RIVER HOUSE TRUST, ET AL. - N. CRAYCROFT ROAD SPECIFIC PLAN AND COMPREHENSIVE PLAN AMENDMENT.**

There is a proverb saying if you put a make up on a pig, still it is a pig. The "Amendment" is nothing except some cosmetic make up on the previous scheme which already was rejected by the commissioners. Therefore, again, I would like to express my opposition to that under its new cover called "AMENDMENT" per the information I provided you previously about this scheme.

My hope is that per the reasons that the commissioners rejected the original scheme, this "*Amendment plan*" "which is a diversionary rehash of the previous scheme be rejected as well by the Board of Supervisors.

If the Board of Supervisors has any magic tool in its tool box and by the force of Magic, Magically approves the new scheme, the Pima Country must provide me with a buffer zone between the southern border of my property and the northern edge of the road which has been envisioned by the scheme to connect the property A to Craycroft Rd., through the leach fields of the Park's Toiletttes at the location of Flood Control Office, per the conditions I stipulated in my previous letter and email to you. Many Thanks.

CLERK'S NOTE:

COPY TO SUPERVISORS

COUNTY ADMINISTRATOR

CC: DSD: Chris Poirier & Donna Spicola

DATE 7-27-22cc

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Regards,

Dr. Abdolmajid Kabiri Khalajzadeh

7/26/2022

Corrie Cotugno

From: Valerie Policastro Edie
Sent: Wednesday, July 27, 2022 9:44 AM
To: COB_mail; DSD Planning
Subject: I respectfully object

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 Rex Scott and the Board of Supervisors,

I would like to oppose the proposed rezoning and the entire "project" P20SP00002 on River Rd/Craycroft 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 Basis School- all off which face each other. It's already a prime example of *bad planning*.
 3. I can not even fathom the **density** of what is being proposed there: multiple residential lots, 16 residential 2 story buildings, 3 residential 3 story towers, community building, pickle ball courts, common areas, bocce courts, croquet, administrative buildings!!! It goes on and on...
Our neighborhood can not support more traffic and more people.
 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. *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

CLERK'S NOTE:

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COUNTY ADMINISTRATOR

CC: DSD: Chris Poirier & Donna Spicola

DATE 7-27-22cc

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WWW

Corrie Cotugno

From: Kristin Johnson <[REDACTED]>
Sent: Wednesday, July 27, 2022 11:34 AM
To: COB_mail
Subject: proposed high density development River & Craycroft

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.

Hello:

It has come to my attention that there is an investment group that is proposing a high density 34 acre development on the corner of River & Craycroft.

I am submitting my strong objection to this idea. The area is not set up for high density housing: traffic is a mess already, and where would they get the water and sewer facilities in an area that is already stressed? The foothills is not the place for dense housing projects. The river would be encroached upon. Wildlife, with so little places to live and eat already, would be further exterminated. As a long time resident in the River/Craycroft area, I feel I have a right to express my strong objection to changing the face of the foothills area forever, for the worse. There is plenty of space for developments in areas that are not endangered, like downtown.

Thank you,
Kristin Johnson
5961 E Placita De Las Luces
Tucson, AZ 85750

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CLERK'S NOTE:
COPY TO SUPERVISORS
COUNTY ADMINISTRATOR

cc: DSD: Chris Polier & Donna Spicely
DATE 7-27-22

Corrie Cotugno

From: Gary Schuitema <[REDACTED]>
Sent: Wednesday, July 27, 2022 1:32 PM
To: COB_mail
Subject: River/Craycroft development proposal objection

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 have heard about a proposed 34 acre high density development near the corner of River & Craycroft.

As a resident of the area for many years, I want to register my strong objection to this development. Traffic in this area is already a mess and will be ridiculous with a high density housing development added to it. Aside from traffic issues I have impact concerns for the river and wildlife in the area. Of course, developers don't give a crap about these issues other than money. This rampant development has to stop.

Please do not allow this to move forward. Tell them NO.

Thank you,

Gary Schuitema

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CLERK'S NOTE:
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COUNTY ADMINISTRATOR
cc: DSD: Chris Birier & Donna Spicola
DATE 7-27-22 cc

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