



**Coalition for  
Sonoran Desert Protection**

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**AGENDA MATERIAL**

DATE 8/2/22 ITEM NO. RA 31

July 29, 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

Pima County Board of Supervisors  
33 N. Stone Avenue, 1st Floor  
Tucson, Arizona 85701

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

Dear Chair Bronson, Supervisor Scott and Members:

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

The Sonoran Desert Conservation Plan and its associated Conservation Lands System (CLS) map and guidelines were adopted by the Board after a 4-year stakeholder process that included representatives from development, homebuilding, conservation, and neighborhood organizations. Much consensus was reached and ultimately, when the Board adopted the CLS, the community received and praised the "certainty," which had been lacking in the development battles of the past decades.

This parcel lies 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.

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). We will focus specifically on the BCMA, as disturbances to IRAs are now regulated by the Regional Flood Control District under Title 16.

We are fully supportive of the proposal as presented on Parcel B. As such, our comments are focused on Parcel A.

There are various methods to address compliance with the CLS. There are approximately 5.38 acres of BCMA, with a mitigation ratio of 80% on-site conservation or 4:1 offsite mitigation, or a combination of both. Pima Prospers states:

- *On-site conservation of...the Bio-Core can be set aside on site, and previous disturbances...can be mitigated by protecting, restoring and enhancing the entire areas, or at least 80% of bio core.*
- *Pima Prospers allows for off-site mitigation of CLS lands. For BCMA, 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.*

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The Coalition has worked with the applicants to facilitate improvements to the built environment on the proposed development site since January of this year when the Planning and Zoning Commission deliberated the issue. In addition, the applicants have now agreed to provide 3.72 acres off-site mitigation for their shortfall of on-site conservation of CLS acreage. See Condition #7 of the July 12 staff report. Although most of the property proposed for mitigation is *outside of the CLS*, we feel that there is some value to its protection, given the conditions on site.

The additional vegetation to be planted along the internal drainage of Parcel A may help to mitigate some of the impacts to the BCMA, if it is maintained in perpetuity. **However, care must be taken when designing this new habitat to ensure it can facilitate north-south wildlife movement across the site.** As such, we would suggest pool fencing along either side of the vegetated, sandy-bottomed drainageway in parcel A, excepting the bridge, to facilitate unfettered wildlife movement through the parcel. Even with this approach, this may not provide optimal connectivity for wildlife due to the adverse impacts of development such as light and noise pollution, odors, and domestic pets.

We agree that protection of mature saguaros is beneficial and saves the proposed project further consideration under the Hillside Development Zone, but we would note that it is *not in the CLS* and does not adequately compensate for the proposed loss of BCMA areas. Cats should be kept indoors, or leashed outside, or contained in “catios” (outdoor enclosed areas) and dogs should be leashed, as per county ordinance.

**The Coalition has concerns about the manner in which the applicants of this development address conservation of the CLS lands.** While we note the staff’s generous calculation of credit given or *non-CLS* on-site mitigation and the applicant’s currently proposed *non-CLS* off-site mitigation, this unorthodox application of the Conservation Lands System policies and guidelines is of concern.

**In conclusion, we will not oppose the proposal if our suggestion regarding fencing is required as a Condition of Approval.**

Thank you for your consideration of our comments and concerns.

Sincerely,



Carolyn Campbell  
Executive Director

Cc: Terri Tillman, Senior Planner  
Jenny Neeley, Office of Conservation and Sustainability  
Chris Poirier, Planning Official