



## Coalition for Sonoran Desert Protection

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May 15, 2015

Arizona Center for Law  
in the Public Interest  
Arizona League of Conservation  
Voters Education Fund  
Arizona Native Plant Society  
Bat Conservation International  
Cascabel Conservation  
Association  
Center for Biological Diversity  
Center for Environmental  
Connections  
Center for Environmental Ethics  
Defenders of Wildlife  
Desert Watch  
Drylands Institute  
Empire Fagan Coalition  
Environmental and Cultural  
Conservation Organization  
Environmental Law Society  
Friends of Cabeza Prieta  
Friends of Ironwood Forest  
Friends of Madera Canyon  
Friends of Saguaro National  
Park  
Friends of Tortolita  
Gates Pass Area Neighborhood  
Association  
Native Seeds/SEARCH  
Neighborhood Coalition of  
Greater Tucson  
Northwest Neighborhoods  
Alliance  
Protect Land and  
Neighborhoods  
Safford Peak Watershed  
Education Team  
Save the Scenic Santa Ritas  
Sierra Club–Grand Canyon  
Chapter  
Sierra Club–Rincon Group  
Silverbell Mountain Alliance  
Sky Island Alliance  
Sky Island Watch  
Society for Ecological  
Restoration  
Sonoran Arthropod  
Studies Institute  
Sonoran Permaculture Guild  
Southwestern Biological  
Institute  
Tortolita Homeowners  
Association  
Tucson Audubon Society  
Tucson Herpetological Society  
Tucson Mountains Association  
Wildlands Network  
Women for Sustainable  
Technologies

Supervisor Sharon Bronson, Chair and Members  
Pima County Board of Supervisors  
130 W. Congress St., 11<sup>th</sup> Floor  
Tucson, AZ 85701

### RE: Co7-13-10 Pima County Comprehensive Plan Update, *Pima Prospers*

Dear Chair Bronson and Board Members:

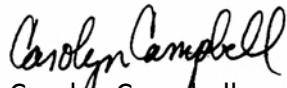
The Coalition for Sonoran Desert Protection appreciates the opportunity to provide comments on Pima County's Comprehensive Land Use Plan update, *Pima Prospers*.

1. The Coalition supports the emphasis in *Pima Prospers* on protecting biologically important lands, encouraging compact development, creating a connected open space preserve system, protecting our water resources, and recognizing the contribution of conservation to the "long-term viability of the region," outlined in Elements of Land Use, Open Space, Water Resources, and Economic Development.
2. We fully support the addition of an official policy addressing Conservation Land System Off-site Mitigation Guidelines (Environment Element, Policy 11 and Policy 12). We recognize that County staff has been unofficially implementing this policy for years, including County Administrator C.H. Huckelberry, and we support codifying this policy in *Pima Prospers*.
3. We reviewed drafts of maps and additional parcel-by-parcel analysis completed for *Pima Prospers*. We appreciate that, in 41 separate cases, County staff is recommending that the Comprehensive Plan reflect density changes or other changes from the current Plan. The Coalition agrees with these suggested changes, with the exception of the eight cases listed in Attachment A (multiple parcels in some cases). Six of these eight cases have been identified as a *Habitat Protection Priority* because of their high habitat values, and two are adjacent to large blocks of preserved habitat (Arthur Pack Park, Mason Audubon Center, Cortaro/Thornydale 60 acres). The best use for these parcels is full conservation, especially since finding like habitat near the area of impact for mitigation is challenging. The Coalition believes that the higher densities recommended by the staff are inappropriate on these parcels and therefore cannot support them. We understand that the property owners may come to the County in the future for rezoning, and would therefore be required to comply with the Conservation

Lands System. However, if that is the case, we believe that the proposal should go through a full vetting of the two-step process – a plan amendment in the annual Comprehensive Plan Amendment process followed by a Rezoning. **At their April 8, 2015 meeting, the Pima County Planning and Zoning Commission supported this recommendation.**

Thank you for considering our comments and recommendations on *Pima Prospers*. **With the consideration of, and action on, the change outlined above in comment #3, the Coalition is prepared to support Co7-13-10 Pima County Comprehensive Plan Update, Pima Prospers.**

Sincerely,

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

Carolyn Campbell  
Executive Director

## Attachment A

Ref. #	Planning Area	Acres	Parcels
IR-06	Tortolita	93	225- 02- 002E- HPP 225- 02- 001B- HPP 225- 04- 015K- HPP 225- 04- 014F- HPP 225- 04- 014G- HPP
IR-09	Tortolita	37	221- 16- 029B- HPP
IR-10	Tortolita	80	224- 44- 0710- HPP 224- 44- 060A- HPP
IR-11	Tortolita	20	225- 02- 027J – Adjacent to NW preserve 225- 02- 027F – Adjacent to NW preserve
IR-18	Tortolita	18.5	224- 44- 0570- HPP 224- 44- 058A
ST-08	Tortolita	5.6	225- 33- 059M- HPP
ST-09	Tortolita	153	224- 44- 0520- HPP 224- 44- 0510- HPP 224- 44- 053A- HPP 224- 44- 054A 224- 44- 0500- HPP
ST-10	Tortolita	10	225- 29- 011A - Adjacent to NW preserve 225- 29- 014A – Adjacent to NW preserve