



Chair Sharon Bronson and members of the Board of Supervisors
Pima County

July 1, 2016

Re: Item 22, Board of Supervisors Meeting, Tuesday, July 5, 2016, Co9-15-04, LANDMARK
TITLE TR 18109 - W. SUNSET ROAD, REZONING

Dear Chair Bronson and Supervisors

The Tucson Mountains Association (TMA) is concerned about the impact of Co9-15-04 on both local and regional movements of wildlife.

1. The development lies across East Idle Hour Wash, which connects the north central Tucson Mountains to the Santa Cruz River midway between its junction with Cañada Del Oro and the Rillito. There is no more important connection between the Tucson Mountains and the Santa Cruz River in this north central area.
2. Although the Environmental Planning Report says “the subject site is not part of any of the six CLS critical landscape connections,” in the opinion of the TMA, the subject site does in fact critically impact the viability of connection 1 (from the Tucson Mountains to the Tortolita Mountains) in the CLS. The CLS describes these connections as “six broadly-defined areas where biological connectivity is significantly compromised, but where opportunity to preserve or otherwise improve the movement of wildlife between major conservation areas and/or mountain ranges still persists.” Although the CLS map attached shows connection 1 as centered on the very north of the Tucson Mountains, in our opinion it should also have recognized the important role of the Santa Cruz River, the land adjacent to the river, and the foothills of the Tucson Mountains connecting more southerly parts of the Tucson Mountains to the river. The extreme north of the Tucson Mountains is too limited an area with too limited habitat diversity to serve as an adequate point of connection for the Tucson Mountains as a whole with other areas. If this perspective had been taken in the Environmental Planning Report, important impacts on CLS Critical Land Connection 1 could not have been denied.

Given the fact that there are few remaining viable connections between the Tucson Mountains and the Santa Cruz River, this development is greatly concerning. The land between the Saguaro National Park and the subject property is mostly developed as SR with most of the vegetation in good shape, as judged from Google Earth. So despite the lack of formal protection, most homeowners have not greatly disturbed the vegetation on their properties. The question is whether this new development would add a serious block on the landscape in a strategically important area for wildlife movements. It is the opinion of TMA that it would, given the

placement of a dense band of home units across the property, although the main channel of the wash itself is reasonably protected.

It has been argued that lack of protection of the vegetation on SR developments means that their value for wildlife can become seriously degraded. Some fraction of property owners do great damage to the native vegetation. Others, however, do not, as is mostly the case in this area. If an upzoning is approved with the understanding that the new plat will be a cluster, with protected open space, TMA agrees there is the potential for a better outcome provided the cluster is in the right place, and does not lead to too large an increase in the number of housing units. But should a doubling of the number of units be allowed? That situation makes it difficult for a better conservation outcome to be achieved because it guarantees continuous intense development in places and doubles the activity of humans and their pets in the area. This can be a serious problem given that most people in the region defy the law and let their dogs roam free.

For these reasons, our recommendation is to restrict the number of home units in the cluster to 33, allowing a 50% increase over the original plat, and require serious wildlife corridors to be retained in the east, west and central areas of the property. We are especially concerned that the central part of the property does not allow for adequate wildlife movements, and that the tongue of protected land in the central area is compromised by the fact that it does not connect adequately in the south. Because of its constriction in the south, some wildlife would not feel safe and would avoid the area. A significant improvement to the central region could be made by removing housing units 12, 13, 26 and 27, as indicated on the attached map. The removal of those units would make the central region more open to wildlife movements while enhancing the value of the designated protected land.

We do agree that the right sort of cluster, even at higher density, can lead to a better outcome for conservation, but if the density is increased too much, that better outcome is not so likely. Moreover, residents who have settled in an SR area, expecting SR to be retained for future developments, can be upset at major increases in density, as evidenced by a letter from a neighbor that you received. In summary, our request is that you reject the application for upzoning without a commitment from the applicant to reduce the number of units, as we have outlined above.

Sincerely

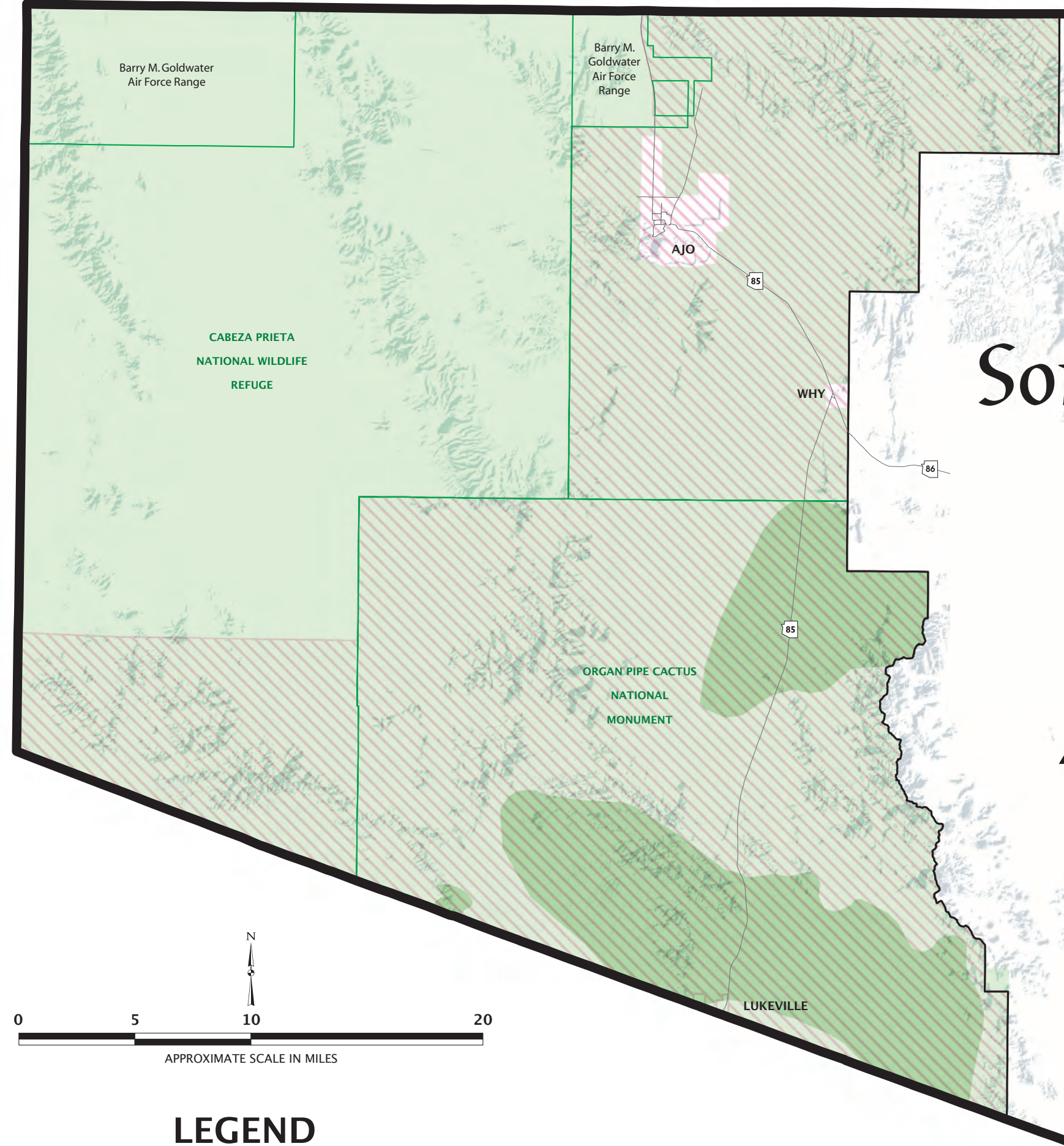


Peter Chesson

President, Tucson Mountains Association



Maeveen Marie Behan Conservation Lands System



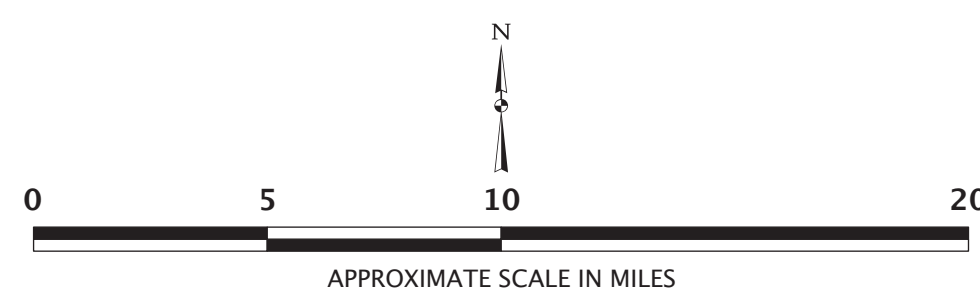
Pima County Sonoran Desert Conservation Plan Priority Biological Resources

Providing Sustainable Development Guidelines as
Adopted in the Pima County Comprehensive Plan



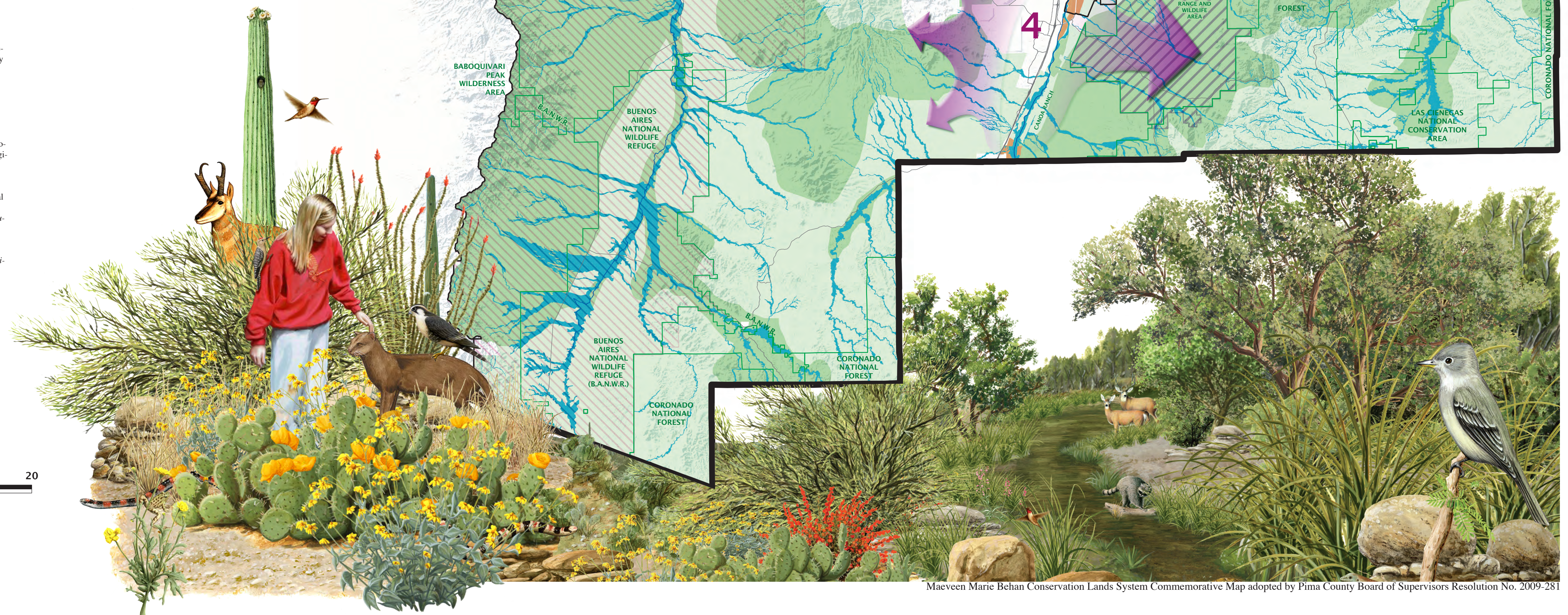
LEGEND

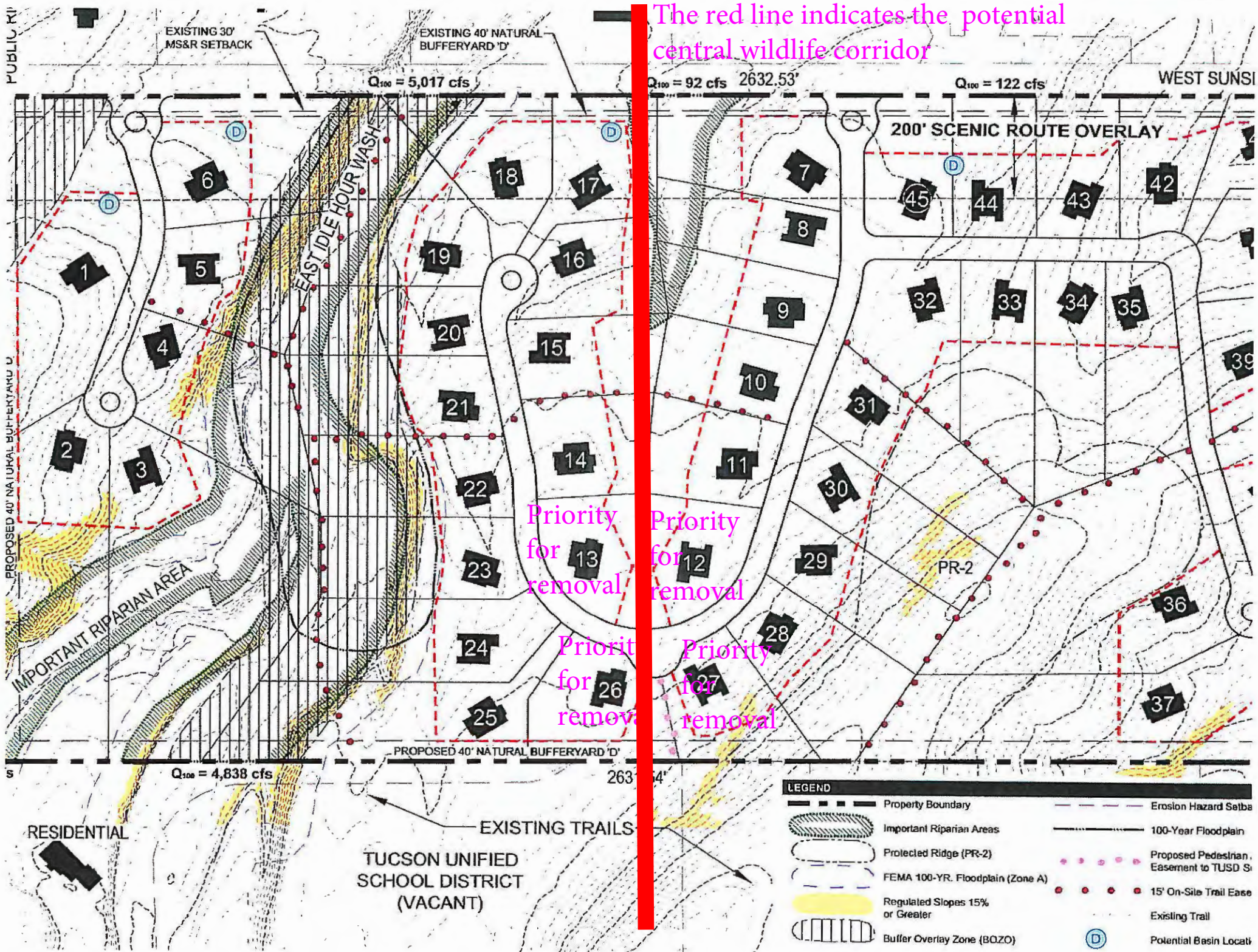
- Important Riparian Areas** are critical elements of the Sonoran Desert where biological diversity is at its highest. These areas are valued for their higher water availability, vegetation density, and biological productivity. They are also the backbone to preserving landscape connectivity.
Landscape conservation objective: 95% undisturbed natural open space.
- Biological Core Management Areas** are those areas that have high biological values. They support large populations of vulnerable species, connect large blocks of contiguous habitat and biological reserves, and support high value potential habitat for five or more priority vulnerable wildlife species.
Landscape conservation objective: 80% undisturbed natural open space.
- Special Species Management Areas** are those areas that are crucial to the survival of three species of special concern to Pima County: the cactus ferruginous pygmy-owl, Mexican spotted owl, and southwest willow flycatcher.
Landscape conservation objective: 80% undisturbed natural open space.
- Multiple Use Management Areas** are those areas where biological values are significant, but do not attain the level associated with Biological Core Management Areas. They support populations of vulnerable species, connect large blocks of contiguous habitat and biological reserves, and support high value potential habitat for three or more priority vulnerable species.
Landscape conservation objective: 66% undisturbed natural open space.
- Scientific Research Areas** are those lands within the Tucson Basin that are managed for scientific research: the Santa Rita Experimental Range and the University of Arizona's Desert Laboratory at Tumamoc Hill.
Landscape conservation objective: Continue management for the purpose of promoting scientific research on the environment and natural resources.
- Agricultural In-Holdings** consist of active, or abandoned, agricultural lands that lie within the Conservation Lands System.
Landscape conservation objective: Ensure that future, non-agricultural land uses conserve on-site resource values where present, facilitate the movement of native wildlife and the pollination of native flora across the landscape, and do not adversely impact surrounding CLS lands.
- Critical Landscape Connections** are six broadly-defined areas where biological connectivity is significantly compromised, but where opportunity to preserve or otherwise improve the movement of wildlife between major conservation areas and/or mountain ranges still persists.
Landscape conservation objective: Protect existing wildlife habitat linkages, remove obstacles to wildlife movement, and restore fragmented landscapes.
- Areas Outside of Conservation Lands System**
- Incorporated Areas and Native American Jurisdictions**
- Pima County Boundary**
- Washes**
- Major Streets**
- Parks**



Notes:

1. Biological data is regional in application and not site specific.
 2. Guidelines do not alter, modify, decrease or limit existing land uses, zoning, permitted activities or management of lands.
- Base map provided by Pima County DOT Geographic Information Services. Layout and illustration by Pima County Graphic Services Department





The red line indicates the potential central wildlife corridor

Priority for removal

Priority for removal

Priority for removal

Priority for removal