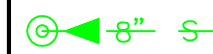


LEGEND



Rezoning Site



Existing Sewer, Flow Direction,
Manhole Number & Line Size

Jim Portner, Agent for Owner
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TUCSON, ARIZONA 85749
520 850-0917



PROJECTS INTERNATIONAL, Inc.
 STRATEGIC GUIDANCE
 ENTITLEMENT PROCESSES
 LOCAL ADVICE & COUNSEL



GRS
 LANDSCAPE ARCHITECTS, LLC

Hardy Estates
 NORTH SIDE HARDY RD, EAST OF THORNYDALE RD
 (Ownership Entity: Whisper Canyon Holdings, LLC)
 REZONING: SR to CR-5

EXHIBIT I-G.1,2
 SEWERS
 PAGE 36

H. RECREATION & TRAILS

1. Public Parks, Recreation Areas & Trails within One (1) Mile

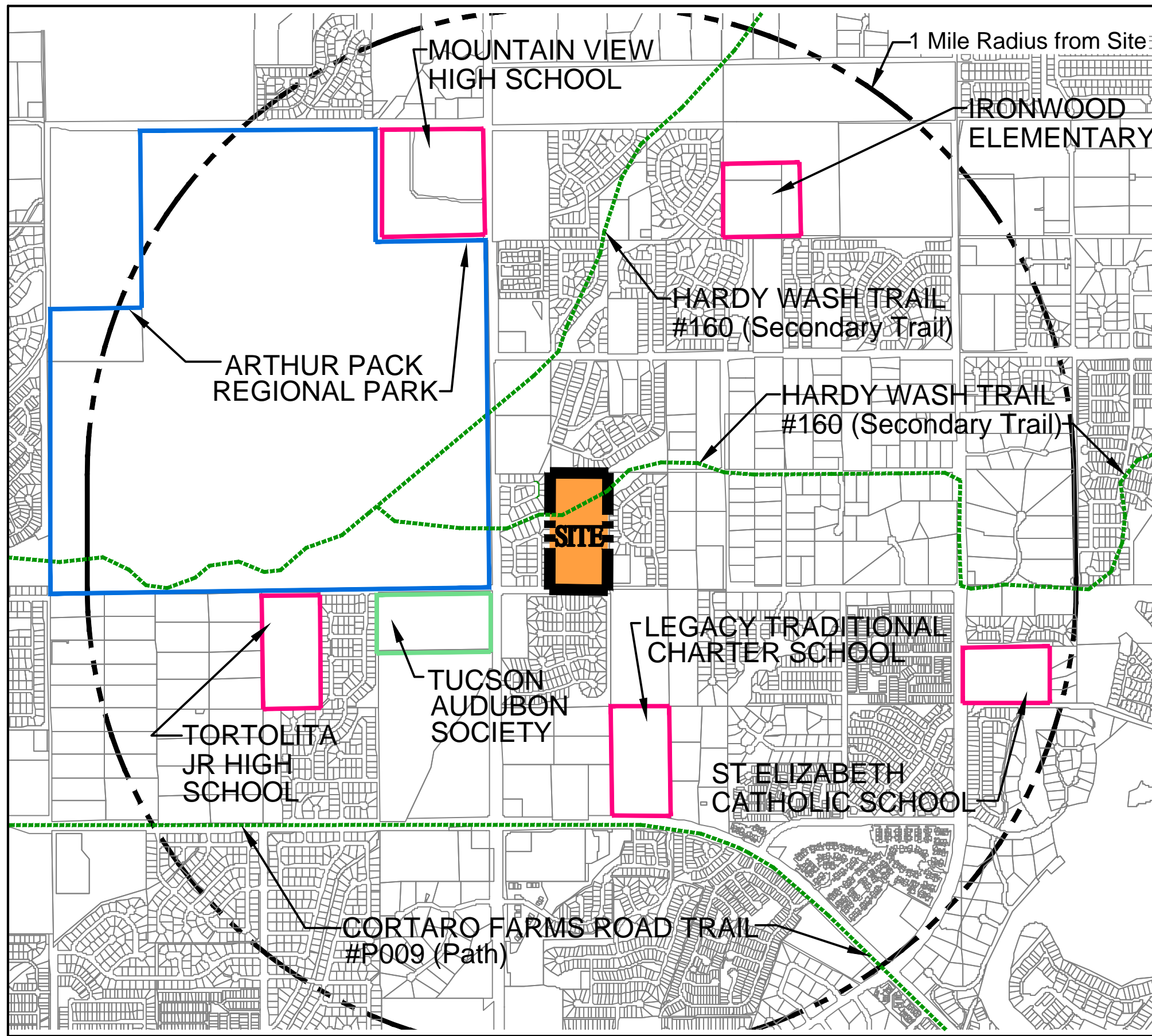
See Exhibit I-H.1 for mapping of the various trails and park facilities located on and in the vicinity of the rezoning site.

Most notably, Arthur Pack Regional Park is located approximately ¼ mile west of the subject property, on the west side of Thornydale Road. This regional park is a Pima County facility managed and maintained by the Department of Natural Resources, Parks & Recreation (DNRPR). It contains natural desert elements together with fully-developed athletic fields, a golf course, improved trails, and various activity facilities.

2. Pima Regional Trails System Master Plan (PRTSMP)

The conceptual alignment for the Hardy Wash Trail #160 (a secondary trail) is depicted on the 2010 Pima Regional Trails System Masterplan and traverses the northern portion of the subject property. This Hardy Wash Trail alignment also traverses several existing residential subdivisions lying to the east and west of the subject property. It has been physically implemented in only a few areas, the most notable of which lies within Arthur Pack Regional Park to the west of the rezoning site. No physical trail improvements currently exist on the subject property, nor on the existing residential subdivisions located to the immediate east and west.

Exhibit to Follow



LEGEND



Rezoning Site



Designated Pima County Trail from Pima County Regional Trail System Master Plan



Public Park



Public/Private School



Tucson Audubon Society

NOTE:

There are no designated trail heads within the area illustrated on this exhibit.

Jim Portner, Agent for Owner
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I. CULTURAL RESOURCES, ARCHAEOLOGICAL & HISTORIC SITES

1. Records Check and Letter Report

A cultural resources records review was completed for subject property by David Stephen of Professional Archaeological Services of Tucson, LLC (PAST) in April, 2016. The search reviewed the existing records in the AZSITE database, as well as the National Register of Historic Properties (NRHP). These sources indicate that no archaeological sites had been previously documented on the subject property. The PAST report is included here as Exhibit I-I.1.

a. Prior Field Surveys

Per the above, the only prior archaeological survey that included the property was the Northern Tucson Basin Survey (NTBS) conducted by the Arizona State Museum (ASM) and the University of Arizona (UA) in the early/mid 1980's.

b. Previously Recorded Archaeological or Historic Resources

No archaeological or historic sites of significance were found in the aforementioned records review.

c. Probability of Buried Resources

There is a low probability of buried resources based upon the aforementioned records review.

d. Recommendation as to Future Surveys

Due to the fact that the prior NTBS survey methodology would not be considered adequate by current State Historic Preservation Office (SHPO) standards, the PAST suggests that a new survey, meeting currently accepted survey standards and protocols, be completed for the property. It is the developer's intent to complete this survey at the time of subdivision platting.

2. On-Site Archaeological or Historic Resources

Not applicable per the above findings.

Exhibit to Follow



4/11/2016

Mr. Jim Portner
Projects International, Inc.
10836 E. Armada Lane
Tucson, AZ 85749

RE: Records Research For The Hardy Estates Project Pima County, Arizona
PAST No. 162054

Dear Mr. Portner

At the request of Projects International, Inc. personnel from P.A.S.T. undertook a cultural resources records review of the Hardy Estates property in unincorporated Pima County, Arizona. P.A.S.T. consulted the AZSITE database for previously conducted surveys that encompassed, intersected or are located adjacent to the subject parcel as well as for previously recorded archaeological sites. Information in the National Park Service National Register Information Systems Database was also reviewed for National Register of Historic Properties listed properties or districts.

The intent of the records review is to compile relevant information about known cultural resources located on the subject property as well as the likelihood of buried archaeological resources not visible from the surface being present that would be impacted by development of the property. Having such information would enable an informed recommendation to be made as to whether an archaeological survey of the properties is warranted. Pima County requires this information as a component of their site analysis report.

Based on assessor information, the 20-acre Hardy Estates property is a privately owned parcel in Section 20, Township 12S, Range 13E, Gila and Salt River Baseline and Meridian, Pima County, Arizona. It can be found on the Jaynes, AZ 7.5-minute U.S. Geological Survey topographic quadrangle (Figure 1) and is shown as parcel 22502029C in the on-line Pima County Geographic Information System. Figure 1 is a rendition of a portion of the U.S.G.S. Jaynes 7.5-minute topographic map that shows the parcel boundaries and archaeological sites (if any) within the project area. Projects with boundaries extending across multiple U.S.G.S. maps are so noted in the lower left of Figure 1. The boundary shown on the map is reasonably accurate given the limitations of a 1:24,000 scale map. It is based on data and maps reviewed by P.A.S.T. but it is not intended to represent the precise legal extent of the parcel. Unless otherwise noted, land ownership coincides with the parcel boundary shown in Figure 1.

Records Review.

The records reviewed revealed that the subject parcel had either not undergone a complete, intensive archaeological survey or sufficient time had passed since an earlier study suggesting heretofore undiscovered cultural resources may have been

Consulting
Archaeologists

P.A.S.T.
5036 E. Golder Ranch Drive
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85739-9645 USA

Telephone 520.825.3536
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Exhibit I-I.1 (Page 1 of 3)
SWCA Records Review Summary Letter of Findings

Section I - Site Inventory

Hardy Estates Project, Page 2

subsequently exposed that would not have been documented by the initial field work. Based on 2004 SHPO policy (Guidance Point #5), surveys conducted over 10 years ago may need to be updated or resurveyed due to changes in regulations or reporting requirements. However, the final decision in this matter rests with the responsible agency or municipality. Information obtained from the records review is summarized in the table below.

The records search showed no recorded cultural resources on the parcel. Previously recorded cultural resources within a 100 meter perimeter around the project boundary are noted since such resources may account for the presence of isolated archaeological materials found on the parcel. Because Arizona Geological Survey maps show the parcel located upon middle to late Pleistocene alluvium the likelihood of finding important buried archaeological resources not visible on the surface is low

AREA	Year(s)	Number
Previous surveys that covered intersected subject property:	1981	174.ASM
Recorded archaeological sites on the property in AZSITE:	NONE	
Recorded archaeological sites within 100 meters:	1	

The archaeological survey of the property shown in the above table was associated the Northern Tucson Basin Survey (NTBS) undertaken in the early to middle 1980s. Conducted by the Arizona State Museum (ASM) and the University of Arizona it employed field methods that would not be considered adequate by the SHPO and other agencies.

SUMMARY

Based on information in the Arizona State Museum site files office, an intensive archaeological survey and the associated report will be necessary to document the presence or absence of cultural resources for this parcel. It is important that both the field work and report conform to current regulatory standards. Although it would appear that further archaeological studies will be required for this property, this should be verified with the agency or municipality that has oversight for this property.

Ground disturbing activities on the property should not commence without authorization by the agency archaeologist(s). There remains the possibility that ground disturbing activities could reveal the presence of heretofore undiscovered cultural resources on the property. If such materials are discovered construction activities should stop. Consultation should be initiated with the cognizant agency archaeologist, and if applicable under ARS §41-841 *et seq.* the Arizona State Museum, to assess the potential significance of any materials unearthed. Under State law (ARS 41-§865 & §41-844) if human skeletal remains or funerary objects are discovered on either public or private lands the Arizona State Museum should be contacted immediately.

Please contact me if you have questions or need further information.

Sincerely,



David Stephen, Ph.D.
Senior Archaeologist

P. A. S. T.
Professional Archaeological Services & Technologies
5036 Golder Ranch Drive, Tucson, AZ 85739 520.825.3536

Exhibit I-I.1 (Page 2 of 3)
SWCA Records Review Summary Letter of Findings



J. AIR QUALITY

1. Proposed Industrial Facilities

Not applicable; there are no Industrial facilities planned or proposed for this development.

K. COMPOSITE MAP

1. Description of Major Characteristics

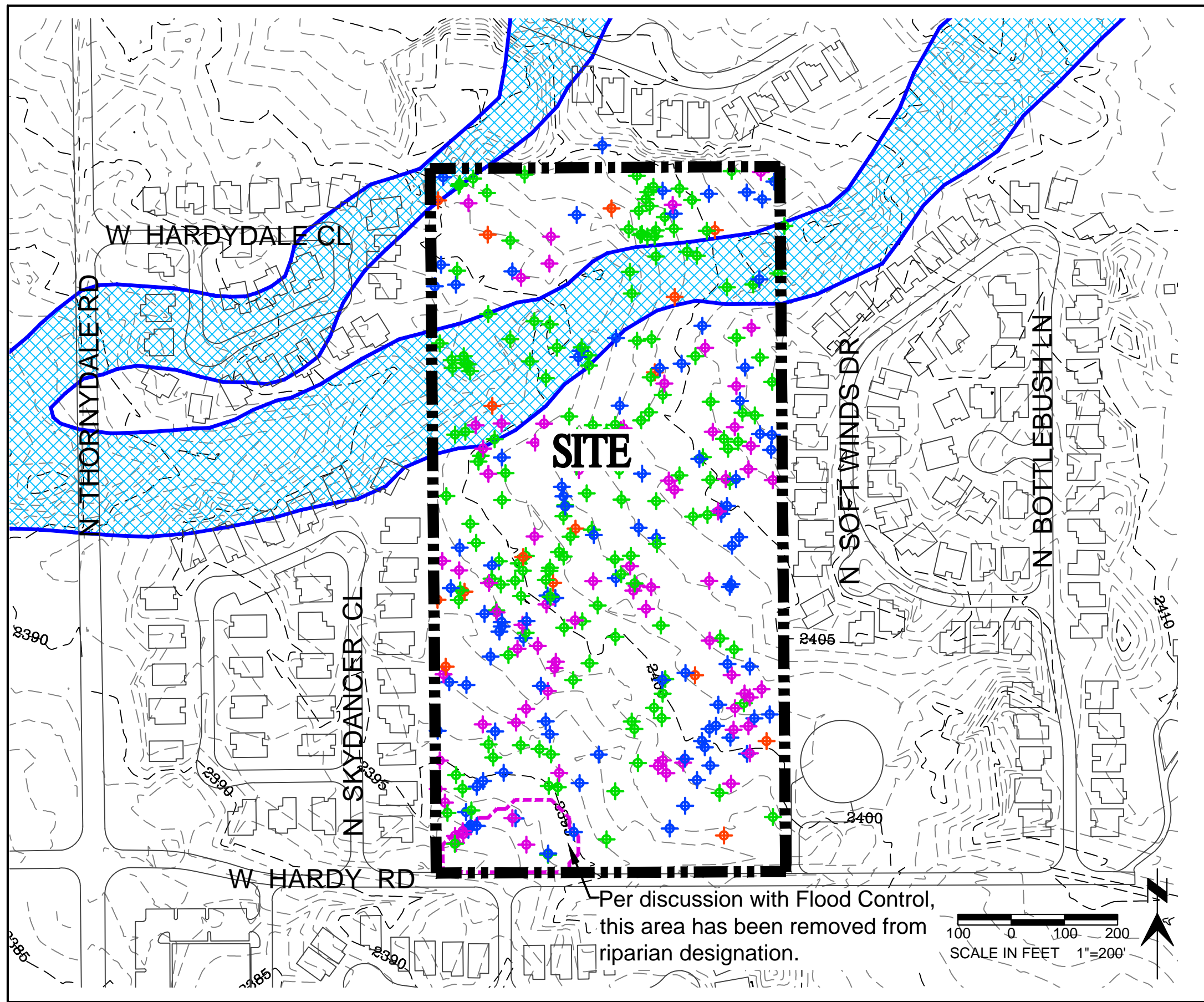
The site is generally unremarkable in terms of landform or significant features, except for the fact that it possesses a rich stand of natural desert vegetation and designated riparian habitat. The specific characteristics cited in the Site Analysis Guidelines are respectively addressed on Exhibit I-K.1-3 (Composite Map) as follows:

1. **Topography.** There are no restricted peaks and ridges, rock outcrops, talus slopes, or slopes of 15% or greater. As such, none of these topographic features are depicted on the Composite Map exhibit. The Exhibit will contain only the 1' contour interval mapping of the site.
2. **Hydrology.** The Composite Map exhibit will contain the following identified items from the checklist: (a) the 100-year regulatory floodplains traversing the site in the existing condition.

The following items from the checklist do not exist on the property and so will not be depicted on the Composite Map: (b) sheet flow areas; (c) federally mapped floodplains and floodways; (d) regulated riparian habitat areas; and (e) lakes, ponds, springs, wetlands, etc.

3. **Biological Resources.** The Composite Map exhibit will contain only the following three (3) identified items from the checklist: (a) all saguaros, mapped and categorized based their height; (b) ironwood trees; and (e) areas of significant or important vegetation.

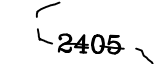
The following items from the checklist do not exist on the property and so will not be depicted on the Composite Map: (c) pima pineapple cactus; and (d) needle-spined pineapple cactus.



LEGEND



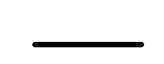
Rezoning Site



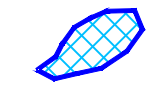
Existing Condition Topographic Contour
(1' Interval)



Erosion Hazard Setback Limit (EHSL)



Approximate 100-Year Floodplain
Limit



Mapped Riparian Habitat --
Important Riparian Areas with
Xeriparian "C"



Saguaro
≤ 6' in height



Saguaro
> 6' - 18' in height



Saguaro
> 18' in height



Ironwood Tree

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SECTION II:
Land Use Proposal

A. PROJECT OVERVIEW

The proposed rezoning can rightly be viewed as an infill development that will fit well within its surrounding established residential context and will make efficient use of the existing public and utility infrastructure that is already in-place.

1. Requested Zoning Designation

Because the Project is not proposed to include multiple zoning districts, the Site Analysis requirements of Section II-A.1. do not apply. The requested zoning designation for the entire rezoning site is CR-5.

2. Characteristics of Proposed Development

The site will be developed as a single-family residential subdivision, the intent of which is to be generally consistent in density and character with the existing subdivisions already in place to the east, south, and southeast. There is, however, one notable distinction between the present proposal and these past subdivisions. The latter were subdivided and constructed in the 1980's and 1990's, when far less restrictive regulations were in place to protect natural drainage features and wildlife habitat areas. As a result, many of these prior subdivisions were almost entirely mass graded and their natural drainages often narrowed, channelized and/or realigned. The residential subdivision proposed under this rezoning will essentially preserve the on-site natural drainageway (Hardy Wash) in its natural state, as well as fully honor the Conservation Lands System (CLS) thresholds for the site through a combination of on-site and off-site set-asides.

Beyond this basic premise, the following particulars apply:

a. Project Design & Response to Site Constraints

The site's major constraints are natural and environmental ones, most notably pertaining to habitat resources and the regulatory floodplain of the Hardy Wash that traverses the property.

The entire site is designated as *Multiple Use Management Area (MUMA)* under the Maeveen Marie Behan Conservation Lands System (CLS), with portions of it classified as CLS *Important Riparian Area (IRA)*. The entire property is further subject to the CLS Special-Species Management overlay, thereby requiring that an 80% preservation threshold be met for the site.

Beyond these habitat considerations, the site contains numerous saguaros and ironwood trees, thereby necessitating special care in applying and executing the Native Plant Preservation Ordinance (NPPO).

The Preliminary Development Plan (PDP) presented below in Section II.B responds to these natural constraints by employing significant set-asides for both the CLS and regulatory-floodplain constraints identified above. The residential lots are located solely in that portion of the property that lies

south of the Hardy Wash floodplain and its associated habitat corridor, thereby preserving the northern 7.2 acres of land in its natural state and as an on-site CLS set-aside.

- b. Conformance with Comprehensive Plan (Pima Prospers), etc.

This Project, as proposed, will comply with Pima Prospers (the Pima County Comprehensive Plan) and all applicable Rezoning Policies.

This Project complies with its Designated Land Use Intensity Category.

The Property is designated as Medium-Low Intensity Urban (MLIU) per Pima Prospers, and is further subject to the rezoning policies of adopted comprehensive plan amendment Resolution No. 2015-28. The complete rezoning policies attendant to this Resolution have been provided in Section I.A.2.c (on p. 2) of this Site Analysis. The Project will provide a single-family, detached residential subdivision of the same basic character and intensity of those already adjacent to it and within the larger Thornydale Road corridor. The proposed CR-5 zoning request for the residential subdivision is permitted under the MLIU category and, further, is consistent with the established zoning construct surrounding the property.

In terms of density, Pima Prospers stipulates a residential density range of 2.5 to 5.0 RAC (residential units per acre) for properties designated MLIU. The *Preliminary Development Plan (PDP)* for this rezoning proposes a subdivision containing fifty-five (55) lots on approximately thirteen (13) developed acres. This calculates to a net-effective density of 4.2 RAC. If we apply the full twenty-acre gross area of the subject property, the gross density calculates to 2.75 RAC. If we exclude the approximately 0.7 acres that will be dedicated to Pima County for Hardy Road right-of-way, the gross density adjusts to slightly more than 2.8 RAC. All of these calculations are compliant with the MLIU density prescriptions.

This Project complies with the County's Pima Prospers Use of Land (Chapter 3) and Physical Infrastructure Connectivity (Chapter 4) policies. The pertinent policies are as follows: Land Use Element (Section 3.1), Environmental Element (Section 3.4), Housing & Community Design Element (Section 3.5), and Transportation Element (Section 4.1).

Land Use Element (Section 3.1)

The proposed project works substantially toward the established Goal 1 objective (p.3.2) of integrating land use with physical infrastructure and resource conservation to insure long-range viability of the region. The requested rezoning integrates with the existing, established, or already-planned transportation, wastewater, potable water, and recreational infrastructure resources adjacent to the property and within the larger Thornydale Road corridor. It represents a quintessential infill development that, by definition, works off of this existing infrastructure

rather than requiring the further expansion of it. The continued residential densification of the Thornydale Road corridor through infill projects such as this one takes advantage of these available efficiencies and enhances the opportunity for expanded multi-modal transportation and transit options.

Environmental Element (Section 3.4)

The proposed project is in full compliance with the Conservation Lands System (CLS), its stated Goal 1 (p. 3.23) objective of conserving and protecting natural resources, together with its enumerated Policies (pp. 3.23 thru 3.31). The subject property was evaluated during the comprehensive plan amendment phase and put forth a site-specific framework plan that illustrated an approximately seven-acre (7 AC) on-site CLS set-aside, while also providing for off-site CLS mitigation so as to insure full compliance with the CLS and its Special Species Management overlay. This rezoning is the next step in effectuating the approved comprehensive plan amendment and its attendant framework plan.

Housing and Community Design Element (Section 3.5)

The proposed project furthers the Goal 8 (p. 3.45) objective of providing new development that is generally compatible and scale-appropriate, as well as the Goal 10 (p. 3.46) objective of ensuring development that reflects the character and sense of place of its given area. This infill project has, from the onset, pursued a very simple goal: provide a single-family residential use that, as best as possible, general fits within and respects the type, character, and density of the existing residential development that already surrounds it. While the actual residential component of the proposed project will satisfy this basic objective, the overall development will represent a significant enhancement over the established surrounding residential context. While the existing adjacent subdivisions were often entirely mass-graded and employed significantly narrowed or channelized drainages, today's more restrictive preservation and regulatory policies yield a subdivision with natural/preserved washes and open space elements, thereby creating a more respectful and sensitive integration of the new project within its established suburbanized context.

Transportation Element (Section 4.1)

The proposed project furthers the Goal 1 (p. 3.45) objective of promoting a comprehensive and multi-modal transportation system. The Thornydale Road corridor is one of the most significant north-south transportation arteries within the overall County transportation system. Multi-modal objectives are met by fostering the growth, intensification, and residential densification of such corridors. At present, the Thornydale corridor is

served by only a single public transit route, this being a Sun *Shuttle* service, not a full-size Sun Tran bus. Continued growth and development of infill parcels, such as the subject property, will contribute toward the goal of achieving truly multi-modal, transit-rich corridors throughout the region.

This Project complies with the County's applicable Rezoning Policies. As mentioned above in Section I.A.2.c (p. 2) and in Section II.A.2.b (p. 46) of this Site Analysis, the subject property is designated as Medium-Low Intensity Urban (MLIU) and is subject to the rezoning policies of Resolution No. 2015-28. Five (5) rezoning policies were stipulated by this Resolution (see p. 2). The proposed residential use for the project, its design and its open space/habitat set-asides (most notably those associated with the Hardy Wash regulatory floodplain) are in accordance with the prescribed policies.

c. Neighbor Issues & Response

The property owner (Whisper Canyon Holdings, LLC) heard and incorporated neighboring property owner concerns during the aforementioned comprehensive plan amendment process for this property (Case No. Co7-14-02), the application of which was ultimately approved by the Board of Supervisors in May, 2015. The conditions of approval attached to that amendment (which were enumerated in Section I.A of this Site Analysis as part of Resolution No. 2015-28)) have been reflected in this rezoning proposal and attendant PDP through the protection and set-aside of the Hardy Wash and its attendant regulatory floodplain and riparian habitat resources.

The rezoning applicant is committed to working further with neighborhood representatives and leaders so as to fully inform them of the proposed rezoning application and the specifics of the residential subdivision planned for the property. These discussions and interactions will be on-going through the rezoning process and we will insure that Pima County staff is kept abreast of their progress.

d. Impact on Existing Land Uses in the Surrounding ¼ Mile Area

The proposed Preliminary Development Plan (PDP) depicts a residential subdivision that is generally similar in type and character to the existing neighborhoods that are already in place to the east, south, and southeast. As alluded to above, however, the degree of on-site habitat protection and the preservation of existing natural washes inherent in the proposed PDP exceeds that which characterizes the prior adjacent subdivisions.

e. Contribution to Smart Growth Principles

The proposed rezoning is consistent with, or furthers, several of the Smart Growth Principles as identified by the Smart Growth Network (SGN). These are individually discussed below:

Mix of Land Uses

Given the emerging urbanization trend in the area and taking into account the property's immediate context, the site is best developed as a residential subdivision. The riparian and drainage constraints impacting the property have carefully been incorporated into the subdivision design to insure that it will coexist well with its existing residential neighbors to the north, west, and east as well as with the established charter school to the south.

Take Advantage of Compact Building Designs

The project will promote a higher population density and intensity within the Thornydale Road corridor and will locate the proposed residential lots in a concentrated spatial arrangements that afford opportunities for efficient on-site infrastructure while, at the same time, creating a significant open space corridor and CLS set-aside of the Hardy Wash riparian corridor.

Multi-Modal Transportation Opportunities

Higher density development always contributes to larger regional opportunities for multi-modal transportation. The Thornydale Road corridor functions as an important north-south transportation artery and is suitable for future bicycle routes and public transit. Higher density development is essential in creating the demand needed to support and further such multimodal opportunities.

Rational Infrastructure Expansion and Improvements

The proposed rezoning and residential subdivision adheres closely to this principle. Intelligent and efficient growth demands the intelligent and efficient use of established public infrastructure. The proposed rezoning site represents an important infill opportunity that will utilize existing public utility and planned transportation improvements, while contributing its fair share of the costs that will be needed to expand same within the proposed development.

Conservation of Natural Resources

The rezoning site falls within the *Multiple Use Management Area (MUMA)* classification of the Conservation Lands System (CLS), with portions of the