



## Coalition for Sonoran Desert Protection

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November 2, 2017

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

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

Society for Ecological  
Restoration

Southwestern Biological  
Institute

Tortolita Homeowners  
Association

Tucson Audubon Society

Tucson Herpetological  
Society

Tucson Mountains  
Association

Wildlands Network

Sharon Bronson, Chair  
Pima County Board of Supervisors  
130 W. Congress St.  
Tucson, AZ 85701

### RE: P16RZ00012 TUCSON LINDA-VISTA 20 LTD PARTNERSHIP, ET AL - N. SHANNON ROAD REZONING

Dear Chair Bronson and Supervisors,

Thank you for the opportunity to provide comments on the proposed N. Shannon Road Rezoning (P16RZ00012).

This 78.6-acre parcel contains multiple Conservation Lands System (CLS) categories under the Comprehensive Land Use Plan. These include Important Riparian Area (IRA), an underlying Multiple Use Management Area, and a Special Species Management Area (SSMA) designation overlaying the entire property.

The CLS categories present on the property have associated open space guidelines: at least 95% open space in IRA and 80% open space in SSMA. CLS guidelines call for on-site conservation and/or off-site mitigation.

The biological importance of this property was further recognized when it was designated as a *Highest Priority Private Habitat Protection Priority* in the Conservation Bond Program, which qualifies it for acquisition and is intended to “guide implementation of the county’s Multi-Species Habitat Conservation Plan.” The Bond Implementation Ordinance states,

The objective of developing the Habitat Protection Priorities was to apply a set of biologically based goals and criteria to the Conservation Lands System to: 1) identify the most important lands to protect first; 2) provide recommendations on the sequencing of land preservation efforts; and 3) design a project so that it can be easily incorporated into an adaptive management program to be implemented over the life of the Federal Section 10 Permit using the best scientific information available.

Full compliance with CLS guidelines is essential. **The Coalition for Sonoran Desert Protection supports the staff’s recommendation to comply with CLS guidelines by using a combination of on-site conservation and off-site mitigation.** These guidelines have been adopted in the Environmental Element of *Pima Prospers*, our state-mandated Comprehensive Land Use Plan. The guidelines provide direction on how to appropriately select off-site mitigation lands and state the following:

- 1) The location of off-site mitigation properties should be within the same general geographic region of the original project site.

- 2) Off-site mitigation property should provide the same or better resource values as the original project site including, but not limited to:
  - a. Conservation Lands System (CLS) designations inclusive of 2004 Conservation Bond Habitat Protection Priority designations;
  - b. Vegetation community type (s);
  - c. Habitat values for applicable CLS Special Species (e.g., breeding, dispersal);
  - d. Surface water or unique landforms such as rock outcrops; and
  - e. Contribution to landscape connectivity.
- 3) Demonstration that the resource and conservation values of the off-site mitigation property will be protected in perpetuity.

Thank you again for the opportunity to comment. If you have any questions, please do not hesitate to contact me.

Sincerely,

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

Carolyn Campbell  
Director