



Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 ☎ sonorandesert.org

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

October 15, 2018

Richard Elías, Chair
Pima County Board of Supervisors
130 W. Congress St, First Floor
Tucson, AZ 85701

RE: P18CA00003, HARBOUR TRUST, ET AL. - N. LA CHOLLA BOULEVARD PLAN AMENDMENT

Dear Chair Elías and Supervisors,

Please find attached the comment letter submitted by the Coalition for Sonoran Desert Protection to the Planning and Zoning Commission on P18CA00003, Harbour Trust, et al. – N. La Cholla Boulevard Plan Amendment when they considered this proposal on August 29, 2018. Our position on this proposal remains the same and the Planning and Zoning Commission agrees with us. **As such, the Coalition supports the Planning and Zoning Commission's recommendation.**

Thank you very much for considering our comments.

Sincerely,

Carolyn Campbell
Executive Director



Coalition for Sonoran Desert Protection

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August 29, 2018

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Chair Brad Johns and Commissioners
Pima County Planning and Zoning Commission
130 W. Congress St., 1st Floor
Tucson, AZ 85701

RE: P18CA00003 - HARBOUR TRUST, ET AL. – N. LA CHOLLA BOULEVARD PLAN AMENDMENT

Dear Chair Johns and Commissioners,

Thank you for the opportunity to provide comments on the proposed N. La Cholla Boulevard Comprehensive Plan Amendment for 22.5 acres, submitted by Harbour Trust, et al. (P18CA00003).

This entire 22.5-acre parcel is classified as both a Multiple Use Management Area (MUMA) and Special Species Management Area (SSMA) under Pima County's Conservation Lands System (CLS) category of the Comprehensive Land Use Plan.

The CLS category of SSMA present on the property has associated open space guidelines that state, in part:

"...at least 80 percent of the total acreage of lands within this designation shall be conserved as undisturbed natural open space...Projects subject to this policy and within this designation will yield four conserved acres (mitigation) for each acre to be developed...Mitigation acres may be provided on-site, off-site, or in combination...Development shall be configured in the least sensitive portion(s) of the property...On-site mitigation area(s) of undisturbed natural open space will be configured to maximize conservation values and preserve the movement of native fauna and pollination of native flora across and through the landscape..

Additionally, the following guidelines apply to properties being considered for off-site mitigation:

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

- a. *Off-site mitigation property should provide the same or better resource values as the original project site including, but not limited to:*
 1. *CLS designations inclusive of 2004 Conservation Bond Habitat Protection Priority designations or subsequent conservation bond programs;*
 2. *Vegetation community type (s);*

- 3. Habitat values for applicable CLS Special Species (e.g., breeding, dispersal);*
- 4. Surface water or unique landforms such as rock outcrops;*
- 5. Contribution to landscape connectivity; and*
- 6. Demonstration that the resource and conservation values of the off-site mitigation property will be protected in perpetuity.*

The applicants state that they will utilize a combination of on-site and off-site mitigation. The Coalition supports this approach, and we look forward to working with both the landowners and county staff moving forward to the rezoning and off-site land identification/acquisition.

Sincerely,

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

Carolyn Campbell
Executive Director