



## Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212  
Tucson, Arizona 85705  
520.388.9925 ✉ [sonorandesert.org](http://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: P18CA00004, QUEST LAND GROUP LLC, 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 P18CA00004, Quest Land Group LLC, 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., 1<sup>st</sup> Floor  
Tucson, AZ 85701

### **RE: P18CA00004 - QUEST LAND GROUP LLC, 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 29.5 acres, submitted by Quest Land Group LLC, et al. (P18CA00004).

This entire 29.5-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:

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

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

Sincerely,

  
Carolyn Campbell  
Executive Director