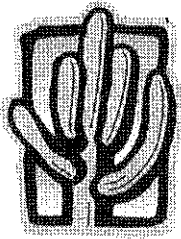


AGENDA MATERIAL

DATE 5/19/20 ITEM NO. RA 23



Coalition for Sonoran Desert Protection

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

May 18, 2020

Arizona Center for Law in
the Public Interest

Arizona Native Plant
Society

Bat Conservation
International

Cascabel Conservation
Association

Center for Biological
Diversity

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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

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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

Ramón Valadez, Chair
Pima County Board of Supervisors
130 W. Congress St., 1st Floor
Tucson, AZ 85701

RE: P19RZ00012 - HARBOUR TRUST 1/3, ET AL. – N. LA CHOLLA BOULEVARD REZONING

Dear Chair Valadez and Supervisors,

Please find attached the comment letter submitted by the Coalition for Sonoran Desert Protection to the Planning and Zoning Commission on P19RZ00012 - HARBOUR TRUST 1/3, ET AL. – N. LA CHOLLA BOULEVARD REZONING when they considered this proposal on March 25, 2020. Our position on this proposal remains the same. **As such, the Coalition supports the Planning and Zoning Commission's recommendation.**

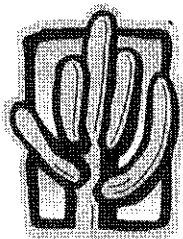
Thank you very much for considering our comments.

Sincerely,

Carolyn Campbell
Executive Director

FILED MAY 19 2020 07:45 PM C.D. KOFED

mw



Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
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March 24, 2020

Arizona Center for Law in
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Arizona Native Plant
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Defenders of Wildlife

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Tucson Herpetological
Society

Tucson Mountains
Association

Wildlands Network

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

RE: P19RZ00012 - HARBOUR TRUST 1/3, ET AL. – N. LA CHOLLA BOULEVARD REZONING

Dear Chair Johns and Commissioners,

Thank you for the opportunity to provide comments on the proposed N. La Cholla Boulevard rezoning for 50.7 acres, submitted by Harbour Trust, et al. (P19RZ00012).

This entire 50.7-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.

Additionally, as described in the staff report, the site is of particular biological importance because of the following attributes:

- *The subject property lies within the Priority Conservation Area (PCA) for the cactus ferruginous pygmy owl (CFPO). No CFPOs have been detected in northwest Tucson since 2006 when the last known individual was captured and placed in a captive breeding program.*
- *There are 249 saguaros onsite, 59 are six feet or less, and 190 are taller than six feet; there are 583 Ironwood trees onsite.*
- *The La Cholla Wash runs across the site's northeast corner and down its eastern border. This resource has both on- and off-site importance as a part of a larger wash system that contributes to landscape permeability in the immediate area. Disturbances to riparian resources are regulated by the Regional Flood Control District according to the Watercourse and Riparian Protection and Mitigation Requirements of Pima County Code Title 16.*
- *The subject property was identified for acquisition as "Secondary Priority Private" under the 2004 Open Space Bond Program.*

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The Coalition has no objection to this rezoning, subject to the Standard and Special Conditions outlined in the Staff Report. In particular, the Conditions that have been proposed by the Regional Flood Control District and Environmental Planning need to be included (Conditions #3A-D and Conditions #5A, 5B).

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.*

We look forward to working with both the landowners and county staff moving forward to address off-site land identification/acquisition.

Sincerely,



Carolyn Campbell
Executive Director