

AGENDA MATERIAL

DATE 8-17-20 ITEM NO. RA #40



PO BOX 86117 • TUCSON, AZ 85754-6117

The Board of Supervisors
Pima County

August 16, 2020

Re: Board of Supervisors Meeting, August 17, 2020, item 40, Hearing, Zone
Code Text Amendment

Honorable Supervisors

The Tucson Mountains Association (TMA) strongly opposes the zoning-code text amendment P20TA00003. ECONOMIC OPPORTUNITY EXPANSION OMNIBUS NO.2 - TRAIL-ORIENTED DEVELOPMENT. TMA is the oldest neighborhood association in Arizona and has been representing residents and promoting environmental conservation and sustainable development in the Tucson Mountains region since 1934. TMA advises that the proposed text amendment should not be approved on two grounds, 1 negative environmental impact, and 2 inadequate community consultation.

1. The proposed text amendment would strongly affect the Santa Cruz River and environs, which is a precious natural resource in this region. The riparian vegetation in the river has long been recognized in the Sonoran Desert Conservation Plan as a key habitat element. It becomes more important when natural vegetation along the banks is retained as a buffer, which allows also a greater variety of organisms to use it. The proposed text amendment is a serious threat to this bank vegetation, much of which has not been treated well, evidently not given priority as a key natural resource. Moreover, the significance of the river and its bank vegetation is magnified greatly in the context of the larger region.

The Santa Cruz River and the vegetation along its banks are a key component of the Tucson Mountains Ecosystem, and remain connected to the Tucson Mountains through the bajada and foothills areas that go all the way to the river. For the health of this ecosystem, it is important to preserve the ability of organisms to move to and from the river across these bajada and foothills areas. Due to the SR zoning, preservation of vegetation on private property, Pima County and Tucson preserved land, and due to several broad washes with well-preserved bank vegetation, these biological connections on the landscape remain intact, but are increasingly threatened by further development. Insufficient attention has been given to ensuring that the remaining connections of the Santa Cruz River to the Tucson Mountains ecosystem as a whole remain intact. The proposed text amendment seriously threatens these remaining connections, and on these grounds it should not be approved.

AUG 17 2020 08:03:40 KUT-RR

2. There has not be adequate community consultation on this text amendment. The memo from Planning Official Chris Poirier, July 17, for this August 17 BOS meeting, notes that the Chairman of the Planning and Zoning Commission said that "staff needs to do a better job at communicating these economic development programs to the community." Moreover, when TMA became aware of a related text amendment, number 3 in this series of text amendments, and alerted its members, Development Services reported 170 emails, which resulting in withdrawal of consideration of the third text amendment, "Adaptive Reuse of Residential Zoning and more Permitted CB-1 uses in rural and industrial zones adjacent to the Chuck Huckelberry Loop along the Santa Cruz River," until further community consultation could be conducted. No similar notification of the community has been conducted for this second text amendment. Its consideration by the BOS under these circumstances is premature. Thus, on these grounds, the BOS should not approve this amendment at this time.

In this letter, we have detailed the environmental impacts of the text amendment. On these grounds, the text amendment should not be approved. We have also given evidence of lack of community consultation, which means that consideration of this text amendment by the BOS at this time is premature. As a final note, although development of restaurants and shops along the Loop is intended to improve the experience for users, degrading the environment, which this text amendment would do, has the opposite effect. The natural experience that users of the Loop currently have would be diminished. It should be enhanced by restoration of habitat, not degraded by unnecessary development.

Sincerely



Peter Chesson
President, Tucson Mountains Association