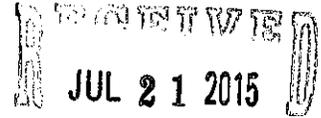


Caroline Gardner
3549 W Shalako Place
Tucson AZ 85742



July 19, 2015

Pima County Development Services Department
Planning Division
201 N Stone Ave., 2nd Floor
Tucson AZ
85701

Re: Case #Co9-15-002 – PRF3 LLC – W. BRIAR ROSE LANE REZONING

To Whom it May Concern,

I am writing this letter in protest of the proposed change of this land parcel from Suburban Ranch (SR) To Mixed Dwelling Type CR-4, which includes Single, Multi-Family residences and duplexes.

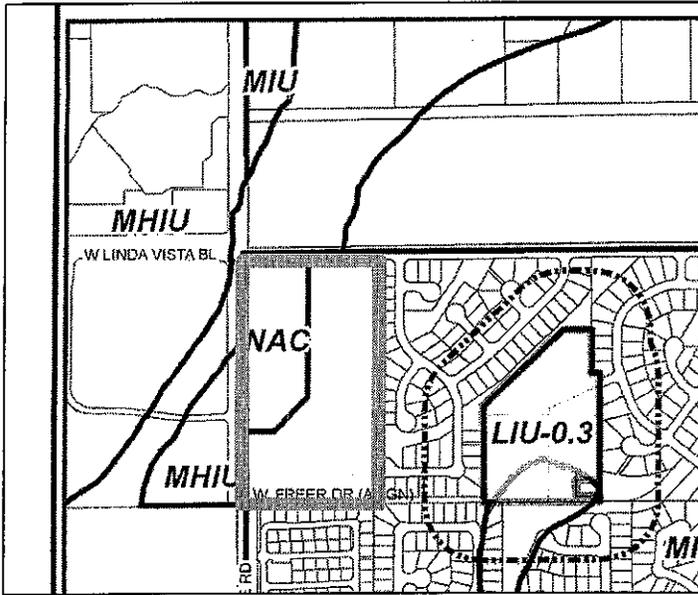
The developers have already made a prior request to rezone the area to a Medium Intensity Urban and Transition area in Spring of 2014, which presumably was denied if the area in question is still designated SR.

The sole entrance to the proposed multi-dwelling project would be Briar Rose Lane. This tiny cul-de-sac is part of a small, manicured development called Las Lindas. The development already has a large influx of traffic during weekdays as it is home to Ironwood Elementary School. While speed humps have been installed to curb speed, there is a large volume of cars that pass through the small neighborhood. The only access to Ironwood Elementary is via Camino de La Tierra from Overton or from Crestone to the North. While the developers feel that the undeveloped end of Freer Road could be used from Thornydale in an emergency, the reality is that it is a very narrow alley between developments and could be very dangerous to drive through as it is filled with debris.

As residents of unincorporated Pima County, our area is not blessed by an abundance of parks, public areas, bike paths or sidewalks. The land parcel in question may not be densely vegetated enough to be preserved as a natural area in the opinion of the developers, but the reality is that for those of us abutting this parcel, it is a beautiful place to walk and enjoy our natural desert. Dozens of locals use the area each and every day, and we have created walking paths with our repeated use. Seeing as it is unlikely that more parks will be developed in our area in the near future, it would be a shame to build into this lovely quiet area. It would be wonderful if it could be developed as an official park, but even without that designation, that is what the area has become for those of us neighboring it.

Finally, as Pima County Flood Control kindly notified us only a few weeks ago, this entire area is now to be considered to be in a, or bordering, a 'mapped flood zone.' The mailing included a wealth of information regarding flood risks, flood insurance and the importance of preserving riparian habitats, as well as the negative consequences of dumping in washes. Construction in this fragile area will only serve to interfere with or destroy the riparian corridor, and increase dangerous debris in the wash.

Instead of developing in important natural area (at least locally) and one that is so difficult to access through small residential arteries, it would be far better to develop along large arteries such as Thornydale. There is a large parcel across from Mountain View High School that would be perfect for rezoning to a mixed dwelling type area, with easy access for traffic and utilities. The area I refer to is highlighted in green below.



In closing, I would like Pima County to take note of my strong protest. I have little doubt that if a survey of local residents within the 300' and 1000' radius were completed, the resounding majority would not be in favor of this land use change and potential development. Please do not take away a quiet, unspoiled area of the desert that all these surrounding communities enjoy.

Caroline Gardner
Resident of the 1000' Notification area

(520) 529-7236

RECEIVED
JUL 20 2015

Shannon Cardea

3581 W. Lenihan Lane
Tucson, AZ 85742
azakut@msn.com

July 16, 2015

Pima County Services/Planning Division
201 N. Stone
2nd floor
Tucson, AZ 85701

Dear Planning Commission members:

I am writing to object to case number Co-9-15-02 which requests a rezone for a parcel of land located Southeast of Thornydale and Linda Vista Roads.

The land encompasses several acres which have been designated as Special Species and Important Riparian areas under the Maeveen Marie Behan Conservation Land System (MMBCLS). It is located in close proximity to Arthur Pack Park and serves as a strategic thoroughfare for a large number of animals including javelina, coyotes, and rabbits. It is also an important hunting ground for hawks and owls.

To destroy this vestige by rezoning would effectively wipe out the birds and other wildlife who live there and completely cut-off the transit route for many other animals to more expansive wildlife areas.

The land also falls in a flood zone. If the development causes flooding to any surrounding homes, the county will be held liable. I strongly urge you to review all potential pitfalls surrounding the development of this land prior to your decision.

As a homeowner who lives adjacent to this land, I purchased my home based on the knowledge that no more than 3 homes would be allowed in that area per the Comprehensive Plan which was recently modified despite numerous objections. I am very disappointed and do not understand why our voices were not heard.

Land speculators/developers should not have the ability to override the important MMBCLS designations in order to make a profit for themselves and to destroy existing homeowners equity as well as the habitat of so many animals and birds.

I am also very interested in why we did not receive notice of the hearing until only 2 days prior to the due date for objection letters and that a large majority of homeowners (all within the 1,000 foot required notice area) did not receive any notification whatsoever.

Respectfully yours,


Shannon Cardea



Coalition for Sonoran Desert Protection

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www.sonorandesert.org

July 23, 2015

Arizona Center for Law
in the Public Interest
Arizona League of Conservation
Voters Education Fund
Arizona Native Plant Society
Bat Conservation International
Cascabel Conservation
Association
Center for Biological Diversity
Center for Environmental
Connections
Center for Environmental Ethics
Defenders of Wildlife
Desert Watch
Drylands Institute
Empire Fagan Coalition
Environmental and Cultural
Conservation Organization
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
Native Seeds/SEARCH
Neighborhood Coalition of
Greater Tucson
Northwest Neighborhoods
Alliance
Protect Land and
Neighborhoods
Safford Peak Watershed
Education Team
Save the Scenic Santa Ritas
Sierra Club–Grand Canyon
Chapter
Sierra Club–Rincon Group
Silverbell Mountain Alliance
Sky Island Alliance
Sky Island Watch
Society for Ecological
Restoration
Sonoran Arthropod
Studies Institute
Sonoran Permaculture Guild
Southwestern Biological
Institute
Tortolita Homeowners
Association
Tucson Audubon Society
Tucson Herpetological Society
Tucson Mountains Association
Wildlands Network
Women for Sustainable
Technologies

Jenny Neeley, Chair, and Commissioners
Pima County Planning & Zoning Commission
130 W. Congress St.
Tucson, AZ 85701

RE: Co9-15-02 PRF3, LLC – W. BRIAR ROSE LANE REZONING

Dear Ms. Neeley & Commissioners,

Thank you for the opportunity to provide comments on the proposed W. Briar Rose Lane Rezoning, Co9-15-02.

This 9.79-acre parcel is designated as *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.

In other words, this is an important parcel and needs to either be protected on-site or the habitat lost needs to be suitably mitigated for by protecting other, biologically-important land.

This 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 with a Special Species Management Area (SSMA) overlay, with the entire property falling within SSMA. 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 if development commences.

The Comprehensive Plan Amendment for this property that was approved by the Board of Supervisors on October 21, 2014 included the following policies, with the understanding that they would be applied at the time of rezoning:

- 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.

Since the approval of the Comprehensive Plan Amendment for this property in October 2014, we have worked with the property owner to assess options for appropriate off-site mitigation. We support their proposal to mitigate their impacts to the CLS by purchasing a ~27-acre parcel in Cochie Canyon in the Tortolita Mountains and deeding this parcel to Pima County for long-term protection and management. In addition, since the acreage of this off-site mitigation parcel does not meet the amount of mitigation as defined by the Conservation Lands System Guidelines (SSMA off-site mitigation equals ~32 acres), we support the following additional rezoning conditions:

- 1) All saguaros at a height of 14 feet or less meeting the transplanting criteria of Pima County Native Plant Preservation, Chapter 18.72 of Zoning Code and the Native Plant Preservation Manual 18.72.S04 shall be preserved in place or salvaged and transplanted on-site where practicable. The property owner/developer shall move and plant a maximum of 10 saguaros, at the time of site construction, which cannot be transplanted on-site to locations to be determined by Pima County, the Coalition for Sonoran Desert Protection and the property owner/developer.
- 2) All ironwood trees meeting the transplanting criteria of Pima County Native Plant Preservation, Chapter 18.72 of Zoning Code and the Native Plant Preservation Manual 18.72.S04 shall be preserved in place or salvaged and transplanted on-site where practicable. The property owner/developer shall move a maximum of 10 ironwood trees, at the time of site construction, which cannot be transplanted on-site to locations to be determined by Pima County, the Coalition for Sonoran Desert Protection, and the property owner/developer.
- 3) The property owner/developer shall move a maximum of 10 palo verde trees, at the time of site construction, to locations to be determined by Pima County, the Coalition for Sonoran Desert Protection and the property owner/developer.
- 4) Prior to grading the subject site, appropriate nonprofits (e.g. Tucson Audubon Society, Tucson Cactus and Succulent Society) will be notified and invited to salvage remaining vegetation on-site.

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 style with a large initial 'C'.

Carolyn Campbell
Executive Director