

SITE ANALYSIS REPORT
FOR A 9.78 ACRES OF PROPERTY LOCATED
WEST OF BRIAR ROSE LANE AND
NORTH OF THE FREER ROAD (EASEMENT) ALIGNMENT

MJMM

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Land Planning and Development Services
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Prepared for:
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May 22, 2015

PREFACE

This report is submitted in connection with a rezoning application proposing a change from SR to CR-4 on property to the west side of Briar Rose Lane & Crestone Drive, and north of the Freer Drive (easement) alignment. The report was prepared in accordance with the official Pima County Site Analysis Report Checklist, as it was amended in March, 2010.

This Site Analysis Report was prepared by Michael Marks, AICP of MJM Consulting, Inc. Assistance in the preparation of specific sections of the report was provided by other consultants. CMG Drainage Engineering, Inc performed the hydrologic & drainage analysis. Oracle Engineering Group, Inc. performed preliminary drainage and grading analysis. WestLand Resources, Inc. performed the vegetative inventory and riparian habitat related work. PAST performed the archaeological work.

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BIBLIOGRAPHY

Existing Land Use Information Sources: Boundary Survey by Physical Resource Engineering, Inc; Pima County Mapguide, Pima County Assessor's Office, Land Use Survey of Subject Property and Surrounding Properties, Aerial Photography, Pima County Planning Division records

Topography Sources: Topographic information by PAG and by Site Visit

Hydrology Sources: Hydrology Report by CMG Drainage Engineering, Inc.

Vegetation Sources: Survey and assessment by WestLand Resources Inc

Wildlife Sources: Letter by Arizona Game and Fish Department, Memo by WestLand Resources, Inc.

Viewshed Sources: Site visit

Traffic Sources: Use of Pima County Street Standards information.

Recreation and Trails Sources: Eastern Pima County Trails Master Plan, Pima County Mapguide

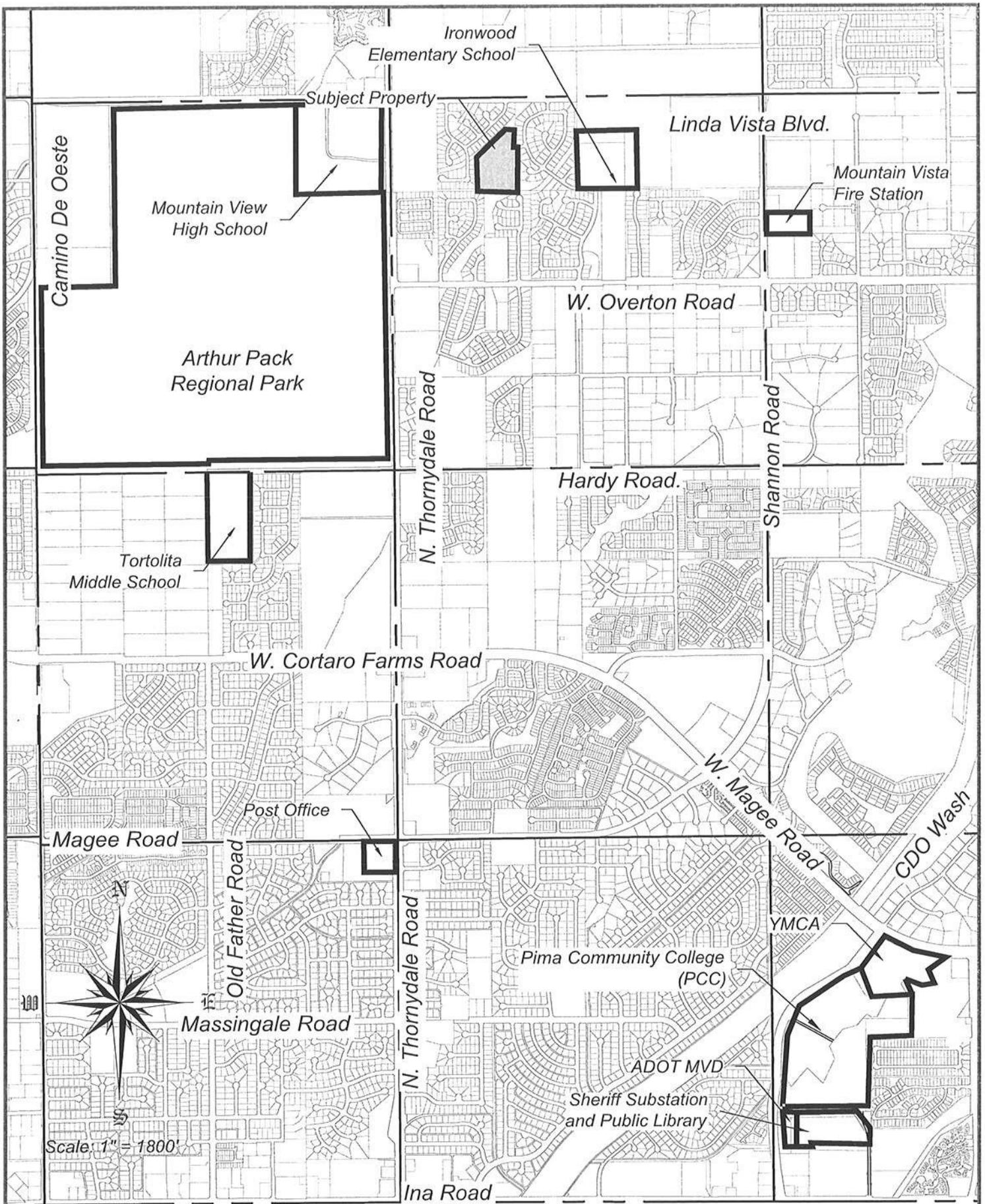
Cultural/Archaeological/Historic Resources Sources: Archaeology Report by PAST

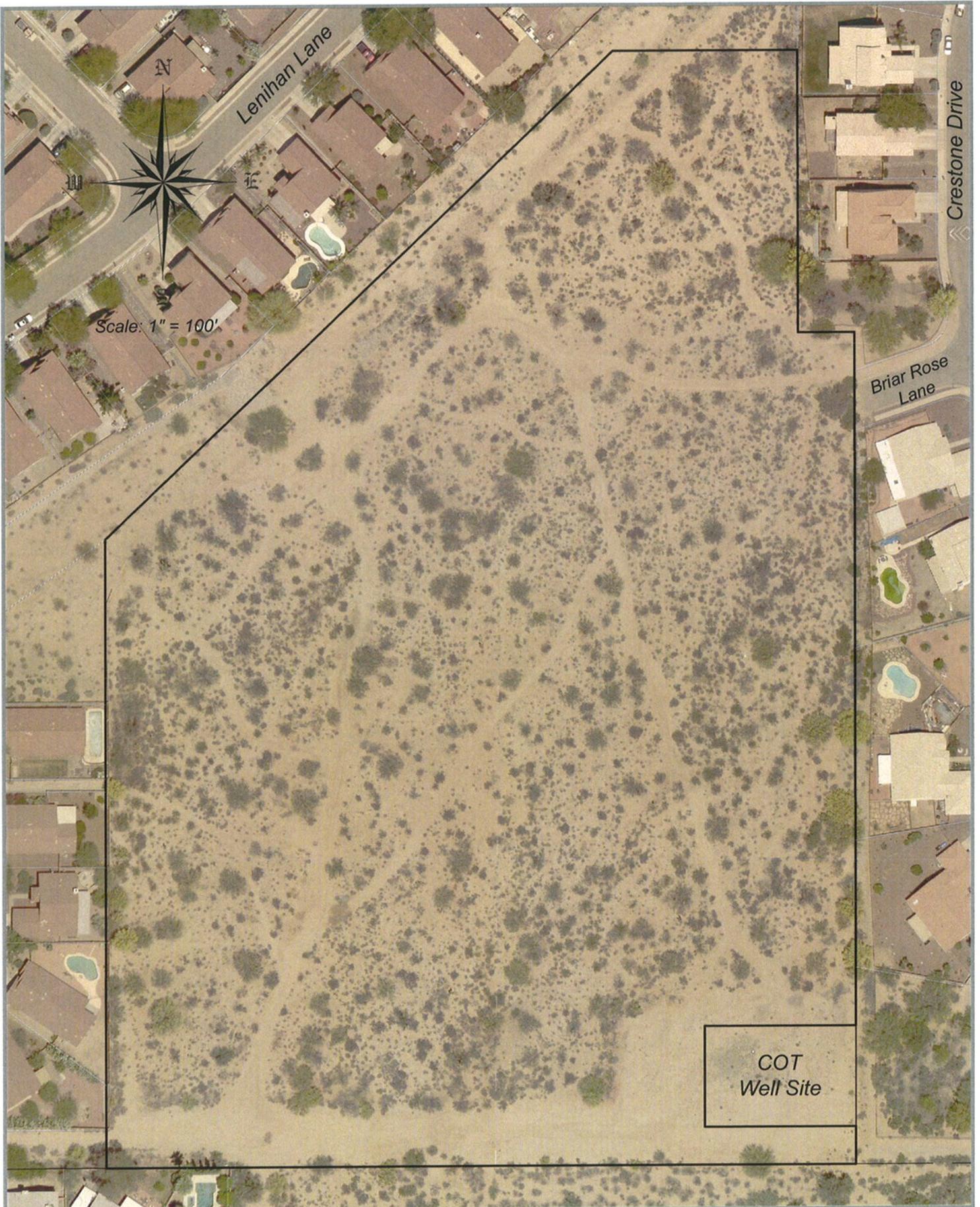
Public Utilities Sources: Records of Pima County Wastewater Management Department, City of Tucson Water, Tucson Electric Company, Southwest Gas, Quest, and site observation.

PART I SITE INVENTORY

I-A. EXISTING LAND USES

1. Exhibit I-A.1, i.e. the Regional Location Map, depicts the site in a regional context. The property is a combination of Assessor Parcels 225-02-004P, 225-02-004Q and 225-02-004V, which are located within Section 20 of Township 12 South, Range 13 East.
2. Exhibits I-A.2a (i.e. the Subject Property Map) and I-A.2b (i.e. the Boundary Map) show the conditions of the property.
 - a. The property is vacant.
 - b. Exhibit I-A.2b shows the 30 foot ingress/egress & utility easement along the south boundary and the 40 foot drainage way easement along the northwest boundary.
 - c. The Comprehensive Plan designates all of the property as Medium Intensity Urban (MIU) except for a small area along the south boundary which is designated as Resource Transition (RT). The area of these two designations is depicted on Exhibit I-A.4b. The Plan Amendment which approved the MIU for the property was granted subject to four Rezoning Policies which addressed onsite riparian and offsite mitigation conditions. Compliance of all four is addressed in Report Section II-A.2.b. Compliance with Policy A is addressed in Sections II-E.1.b & C and II-F.3. Compliance with Policies B-D is addressed in II-E.1.a and in Appendix 4: The Rezoning Policies are as follows:
 - A. Native riparian vegetation shall be used to enhance drainage improvements.
 - B. The location of off-site mitigation properties should be within the same general geographic region of the original project site.
 - C. Off-site mitigation property should provide the same or better resource values as the original project site including, but not limited to:
 1. Conservation Lands System (CLS) designations inclusive of 2004 Conservation Bond Habitat Protection Priority designations;
 2. Vegetation community type(s);
 3. Habitat values for applicable CLS Special Species (e.g. breeding and dispersal)
 4. Surface water or unique landforms such as rock outcrops; and
 5. Contribution to landscape connectivity.
 - D. Demonstration that the resource and conservation values of the off-site mitigation property will be protected in perpetuity.
3. Exhibit I-A.3, the Surrounding Properties Map, is an aerial photo of the subject property and the surrounding area within 600 feet in all directions.
4. Exhibits I-A.4a & I-A.4b show the properties within ¼ mile and addresses the following:
 - a. Exhibit I-A.4a shows the zoning within ¼ mile to be SR, CR-4, CR-5, TR & CB-1. No overlay zones affect any property within ¼ mile.
 - b. CB-1 zoned land exists at the corner of Thornydale & Overton, with a Walgreens and an unoccupied shopping center. On the west side of Thornydale Road there is the Arthur Pack Park. To the east is the Ironwood Elementary School. A number of vacant properties exist within a quarter mile. Mostly, however, within ¼ mile, the developed properties are residential. That residential development is in seven different subdivisions that have densities ranging from 2.96 to 6.74 RAC, and taking them together they have a density of 3.57 RAC. See Appendix 1 for a more detailed description.

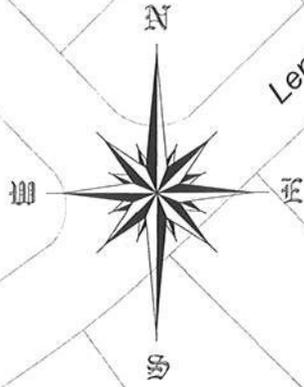




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PRF3 LLC - Briar Rose Lane
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Section 20, Township 12 South, Range 13 S,
Pima County, Arizona

Exhibit I-A.2a
Subject Property Map



Scale: 1" = 100'

Lenihan Lane

N 89° 58' 09" E

146.04'

S 00° 01' 51" E 222.98'

Crestone Drive

Parcel 1
APN:225-02-004Q

L1

Briar Rose Lane

40' Ingress, Egress, and
Drainageway Easement
Docket 8475, page 1960

40' Drainage Easement
Docket 7714, page 258

Parcel 2
APN:225-02-004V

Parcels 1-3 Combined
9.78 Acres

Line Table		
No.	Bearing	Distance
L1	S 89° 59' 58" E	44.94'
L2	N 89° 59' 32" W	120.00'
L3	S 00° 01' 51" E	80.00'
L4	S 89° 59' 32" E	120.00'
L5	S 00° 01' 51" E	30.00'

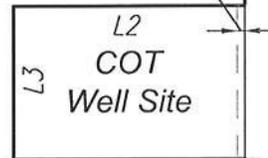
S 00° 01' 51" E 550.28'

N 00° 00' 28" E 498.79'

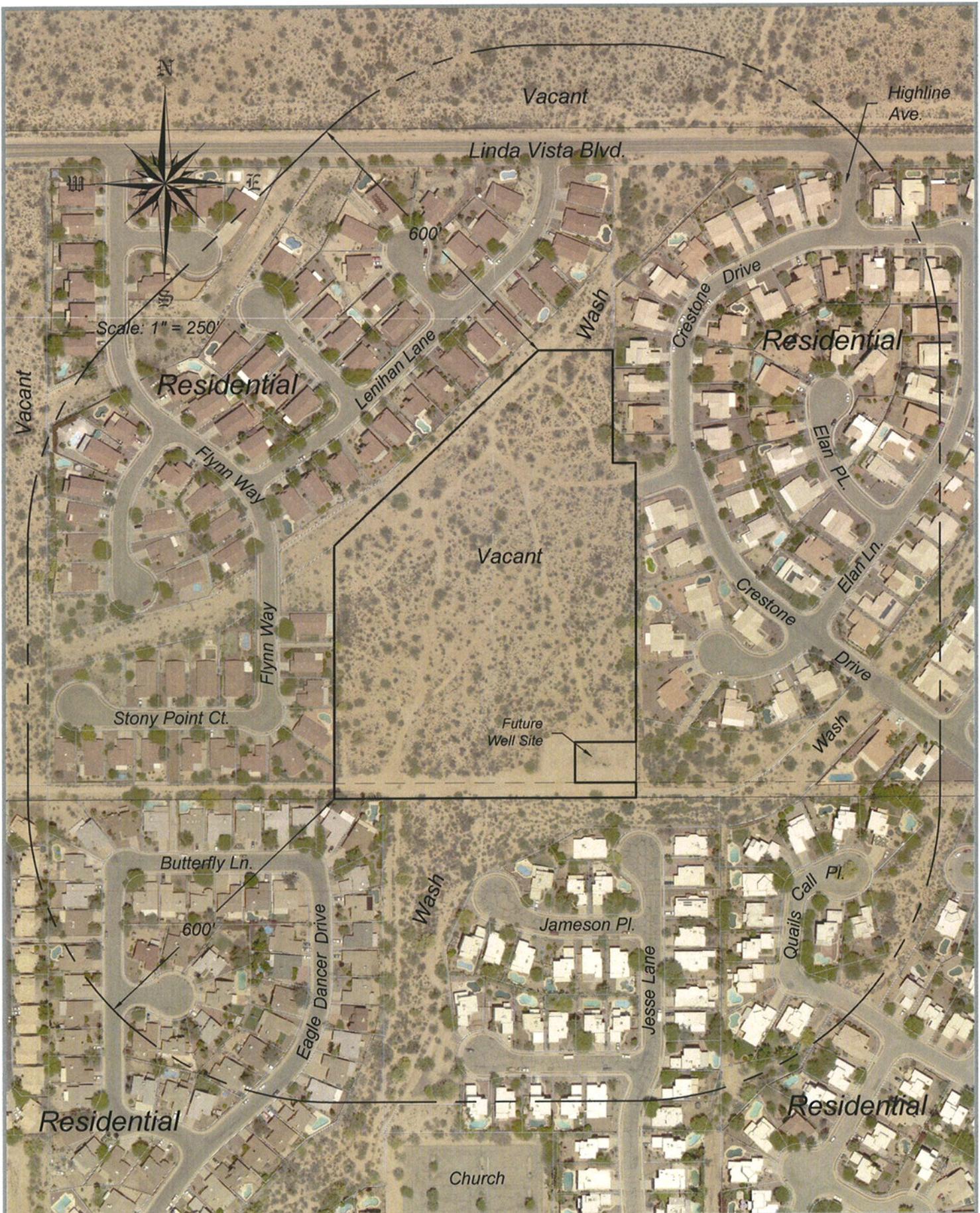
Parcel 3
APN:225-02-004P

4' Drainage
Easement
Dkt. 13730,
pg. 525

30' Ingress Egress Easement
Docket 8475, page 1960
Docket 12630, page 3114



N 89° 59' 32" W 592.01'



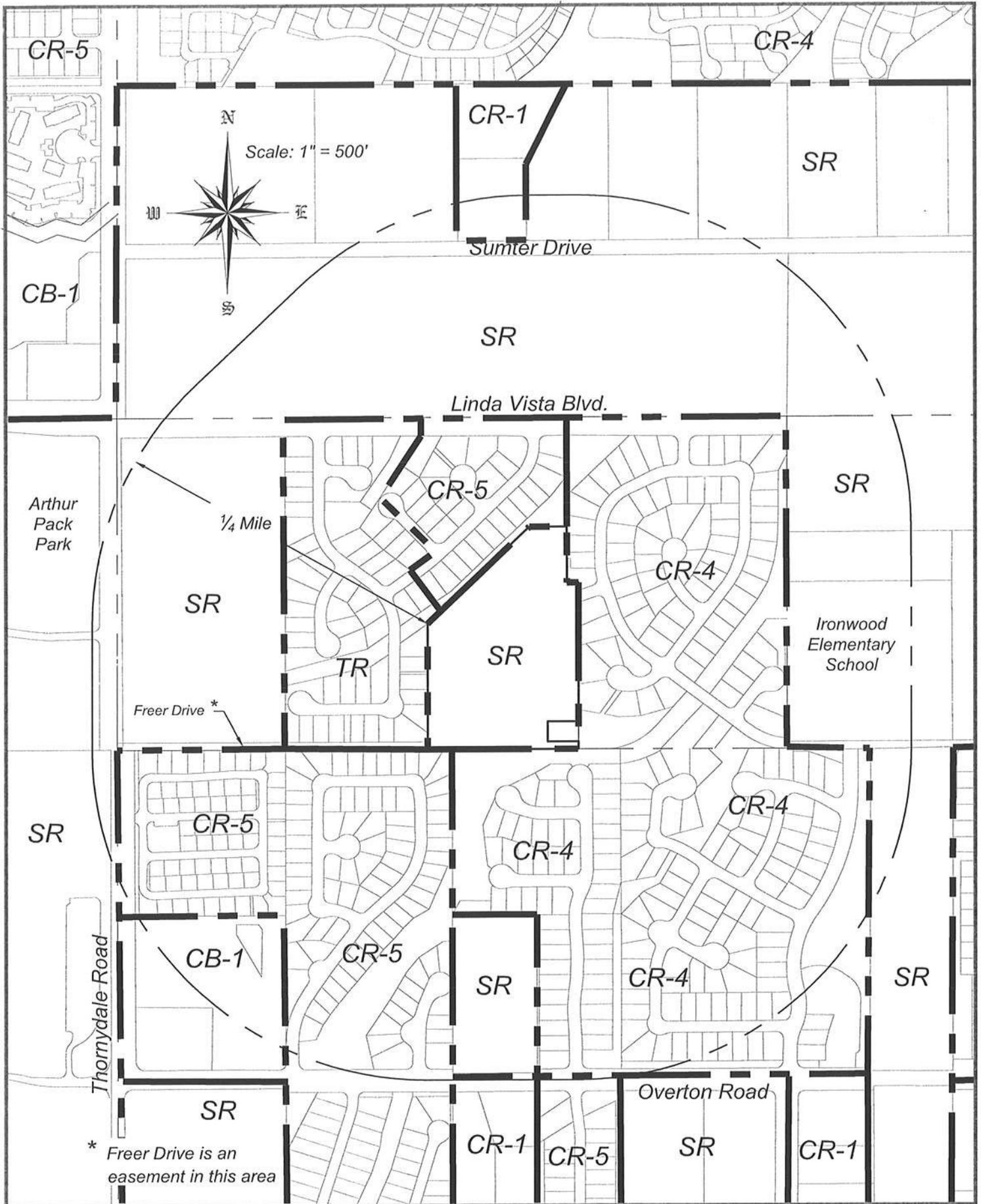
- c. The subdivision to the west is made up of all one-story homes. Otherwise all other adjacent subdivisions have a mix of one and two story homes. Exhibit II-B.1k shows the location of these 2-story homes. The height of the two-story homes is estimated to range up to 25 feet tall. The nearby elementary school is estimated to exceed 20 feet tall, and the Mountain View High School is estimated to be as tall as 45 feet tall in a select portion. The nearby Walgreens is estimated to be about 30 feet tall, with the other unoccupied commercial development to be about 25 feet tall.
- d. There are no properties within ¼ mile which are subject to a conditionally approved rezoning or a subdivision or development plan under review.
- e. Ex. I-A.4b shows the Comprehensive Plan designations for all properties within a ¼ mile.

I-B. TOPOGRAPHY AND GRADING

1. The topographic characteristics of the property, still in mostly in a natural state, are described below and are depicted on the Exhibit I-B.
 - a. There are no restricted peaks or ridges.
 - b. There are no rock outcrops or talus slopes.
 - c. The property is relatively flat (i.e. substantially less than 15%) over all of the property except for a very small area along the northwest boundary which forms the south bank of the existing drainageway. The slope of that bank is so small in area that it is exempt from the calculations according to Zoning Code Section 18.61.030.A.1 so it is not identified as being greater than 15% either in this text or on the exhibit.
 - d. There are no significant topographic features, with the possible exception of the existing drainageway along the northwest boundary.
 - e. Along the northwest border there is a strip of land, approximately one half of an acre in size, which was previously graded by others to construct the drainageway that straddles the northwest boundary. Along the south boundary the 30 foot Ingress & Egress (Utility) Easement was previously graded by others to install utilities and to create a drive-able surface to maintain those utilities. These two graded areas make up approximately 9 percent of the property (and are identified on Exhibit I-B). The remaining 91 percent of the property is in a natural state, except for the dirt trails and vegetative destruction, which are evidence of human activity.
2. The pre-development average cross slope is 3.95 percent. This is based on a total length of contours of 16,800 feet, a contour interval of 1 foot, and an area of 9.78 acres.

I-C. HYDROLOGY

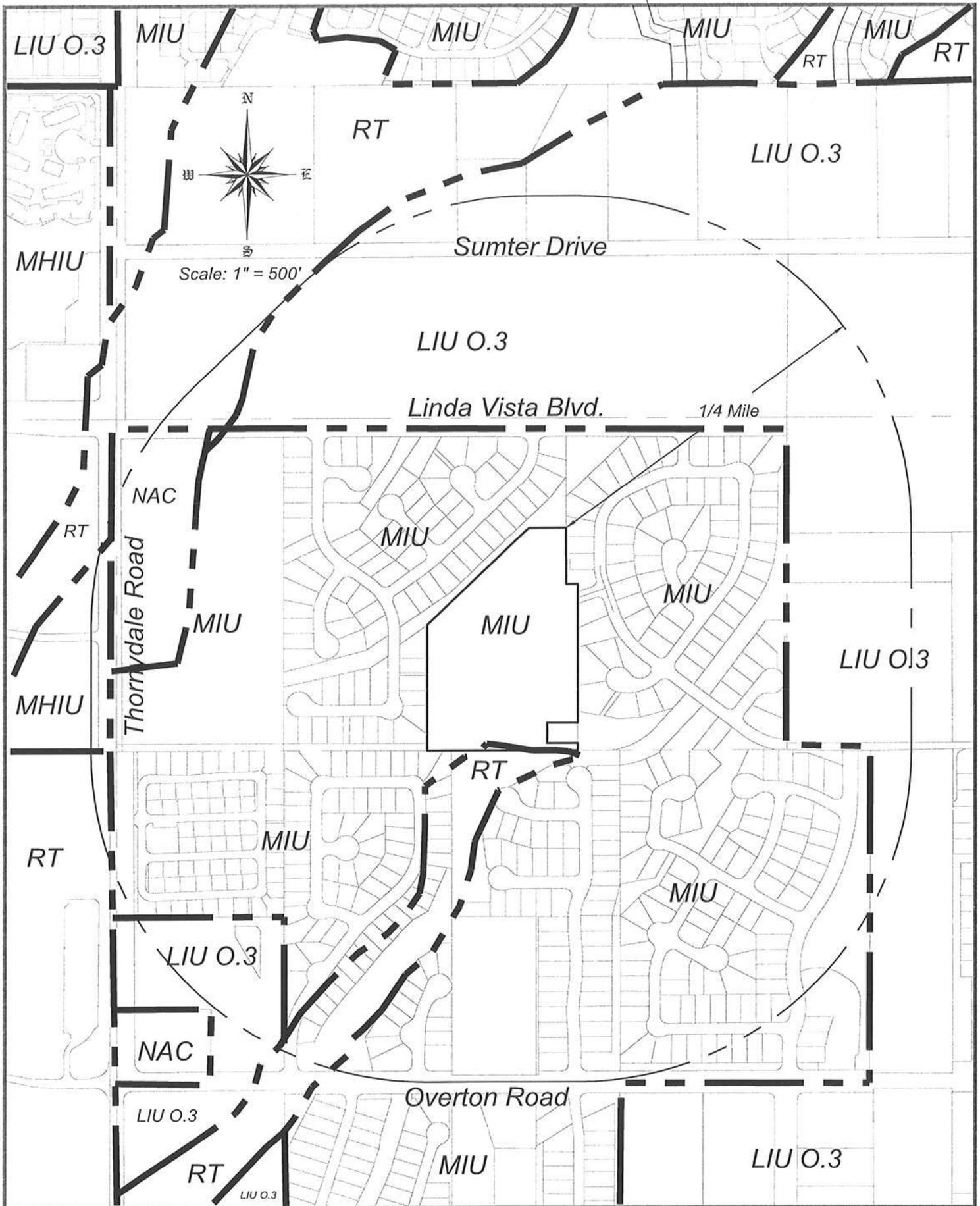
1. Exhibit I-C.1 shows the boundaries of the watershed that impacts the subject property.
2. The upstream watershed identified above is either 'natural' or is made up of primarily low density residential, for that segment from the northerly boundary to Linda Vista Boulevard. South of that road the runoff conditions are modified by the urban density residential development and the related channelization. That channelization has the flows carried in drainageways including the one that runs along the northwest boundary of the subject property. The natural conditions of the site do not affect the upstream or downstream this watershed.
3. The upstream watershed impacts the subject property at two points. At the northeast corner the contributing flow is 486 cfs in the 100 year storm event, with a drainage area of 294.4 acres. At the southeast corner the numbers are 781 cfs, and 631.3 acres.



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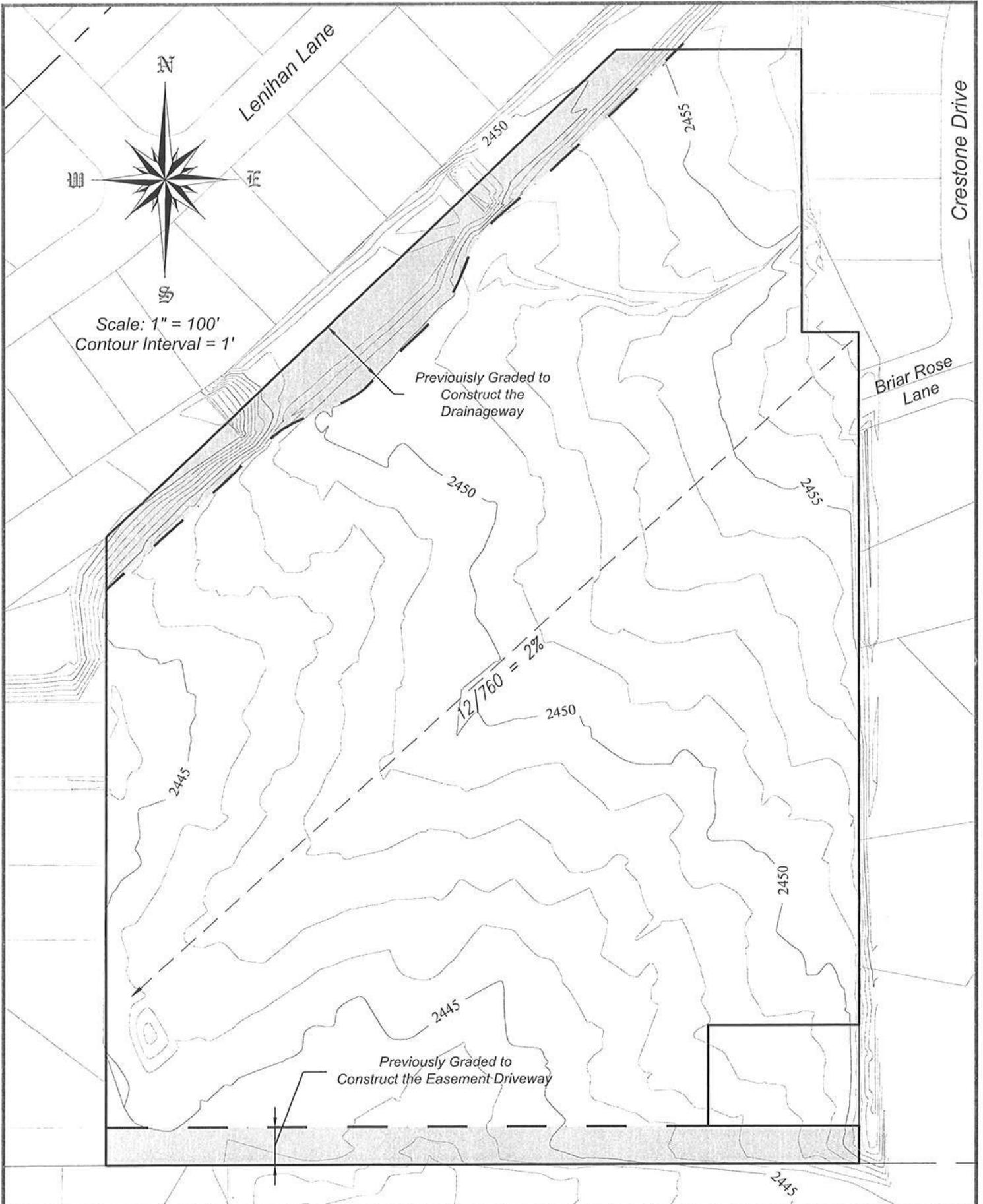
Exhibit I-A.4a
 Vicinity Map with Zoning



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Exhibit I-A.4b
 Vicinity Map with Comp
 Plan



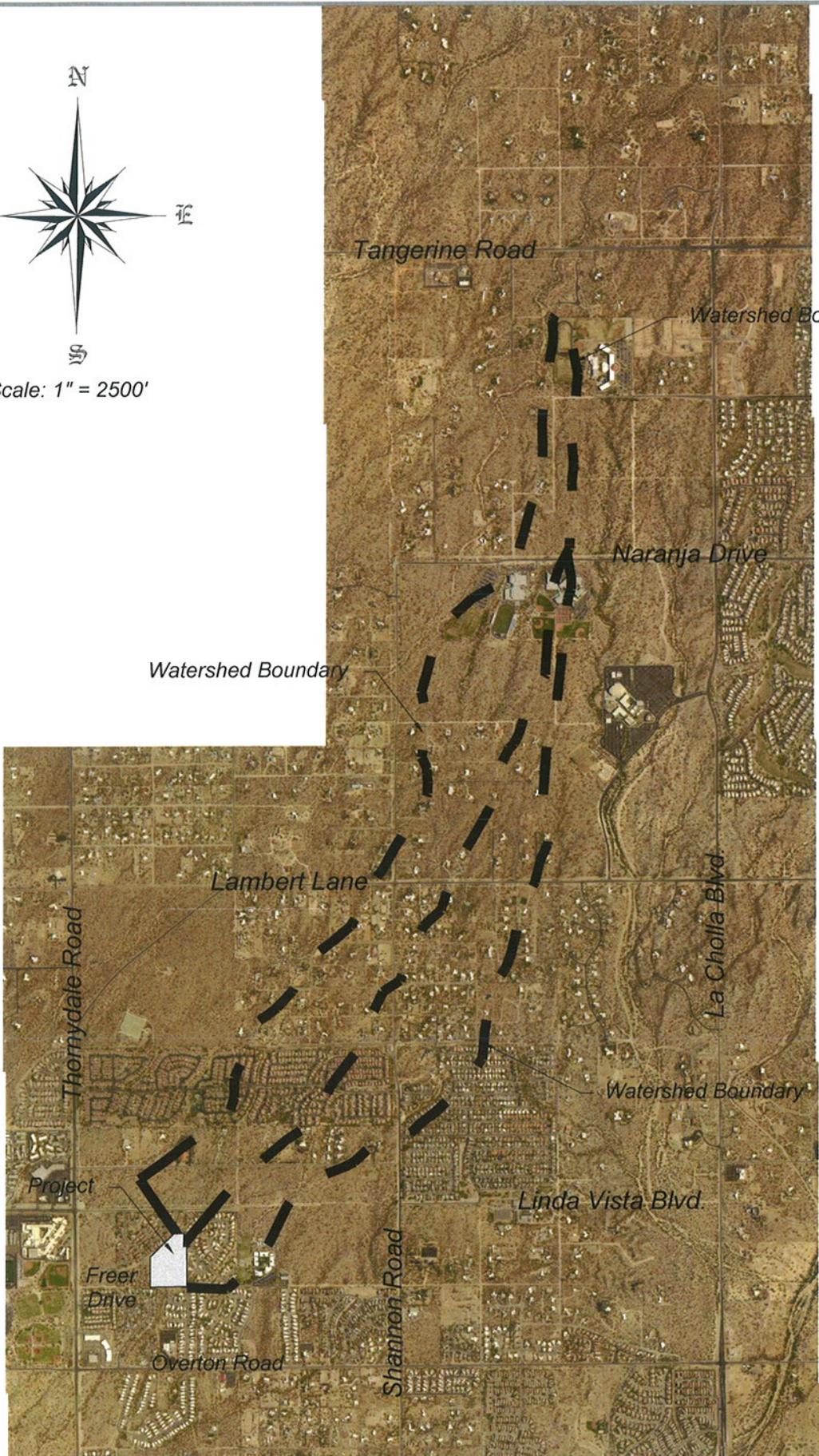
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Exhibit I-B
Topography Map



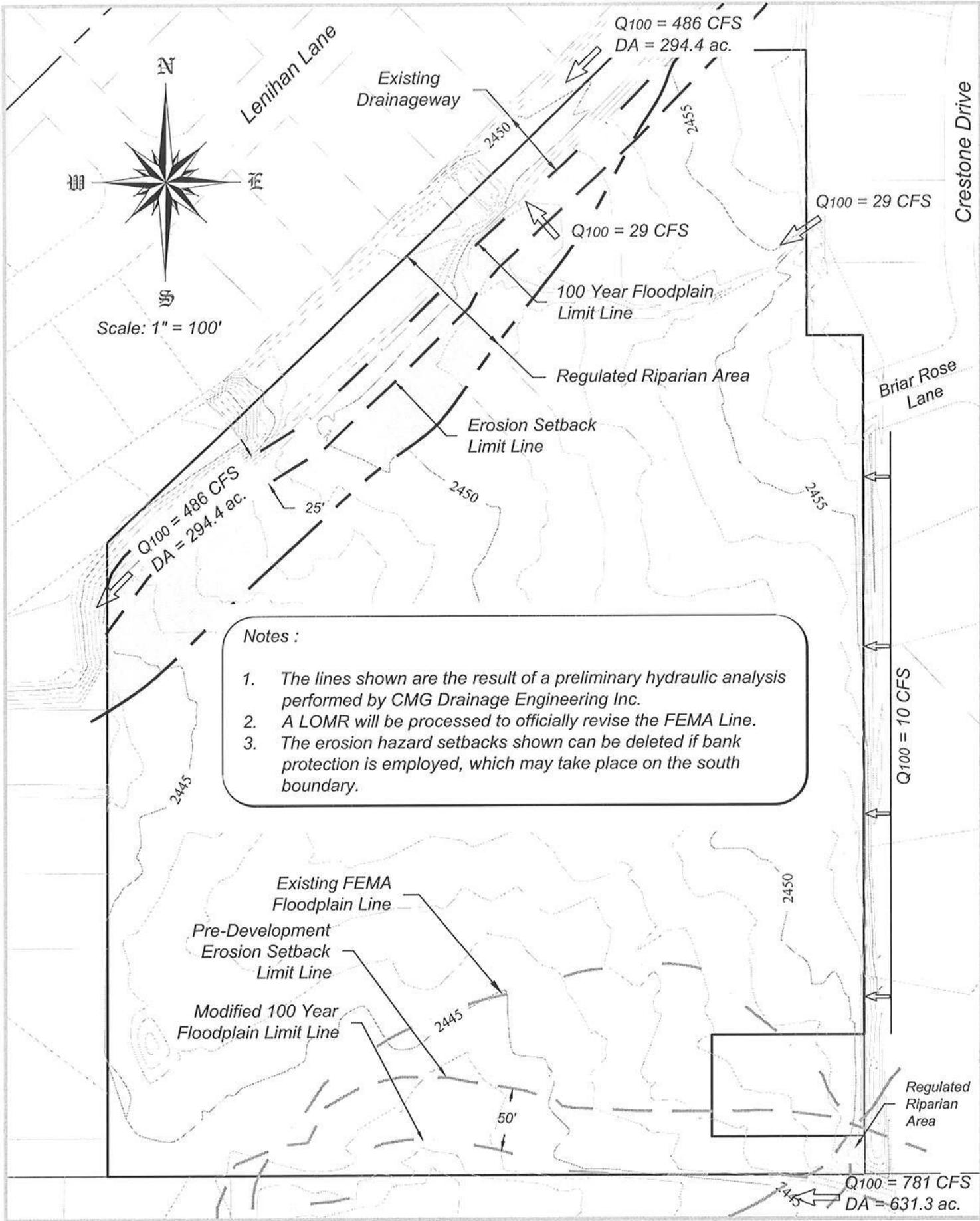
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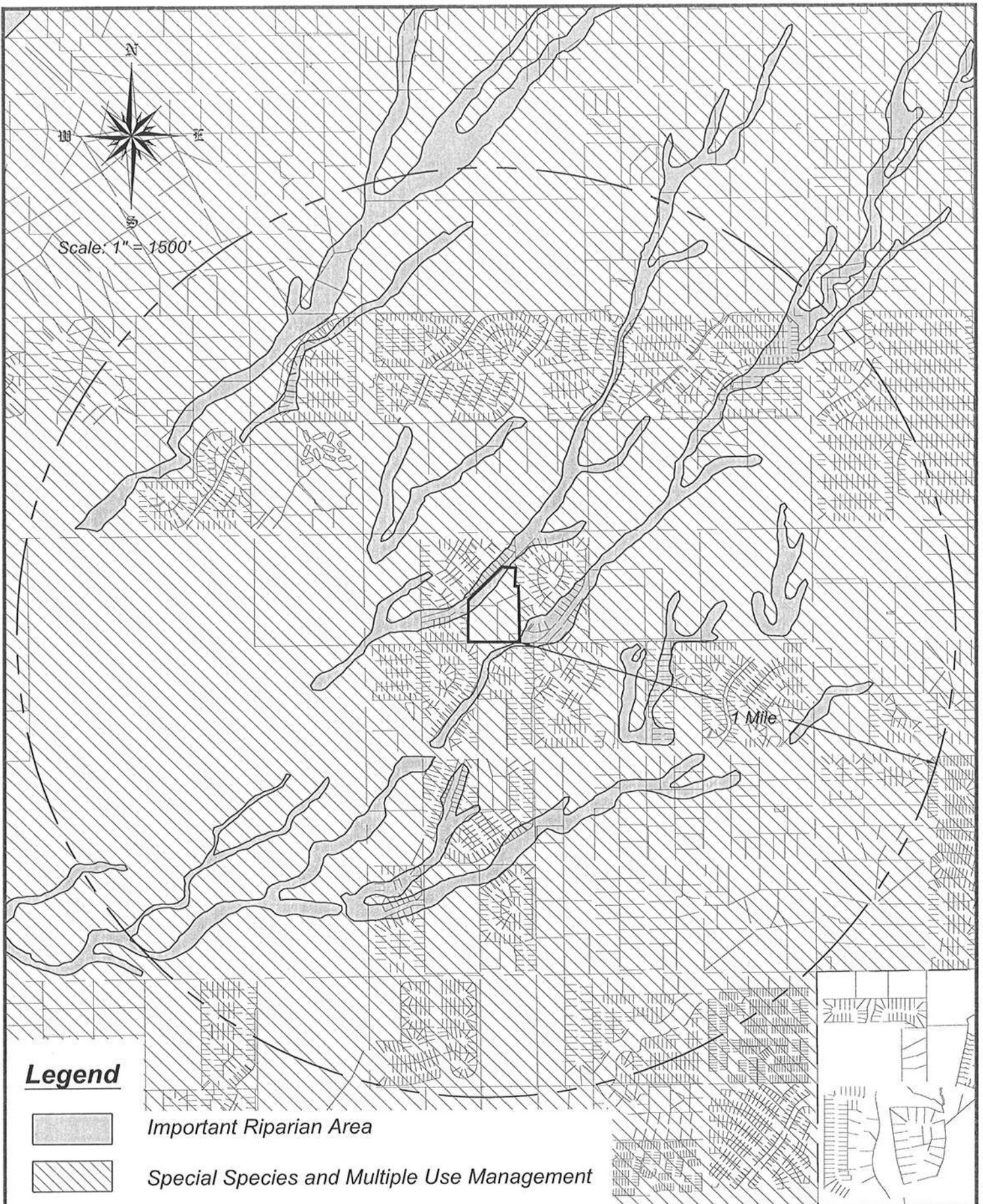


4. The Onsite Hydrologic conditions are depicted on Exhibit I-C.4.
 - a. The 100 year floodplain lines are shown along the north and south boundaries. Along the south boundary there are two flood lines, one being the official FEMA 100 year floodplain line and the second being the modified line based on analysis by CMG Drainage Engineering whose work has been reviewed by the Pima County Regional Flood Control District and found to be correct.
 - b. No sheet flow occurs on the site.
 - c. The 'Existing FEMA Floodplain Line' on the south side is officially a federally mapped floodplain. A Letter of Map Revision (LOMR) will be processed to modify this line and afterwards the only federally mapped floodplain will be that within the 'Modified 100 Year Floodplain Limit Line'. The existing Zone A (i.e. existing FEMA floodplain) and Zone X (i.e. balance of property that is outside of the 100 year floodplain) is identified on FEMA Map No. 04019C1070L.
 - d. The peak discharges entering and exiting the site for both flows in excess of 100 cfs in a 100 year storm are shown on the exhibit.
 - e. The Riparian Habitat Ordinance designates a strip of land along the northwest boundary as Important Riparian Area (IRA) with an underlying Class C. This area is designated on the exhibit. The area along the north boundary is 1.32 acres and the area in the very southeast corner is 0.02 acres.
 - f. This site contains a portion of a drainageway along the northwest boundary. The property line essentially runs along the centerline of that drainageway, with the bottom being engineered dirt with several energy dissipaters and with side slopes being mainly engineered dirt but rip-rapped at select sections.
 - g. No sources of perennial surface water exist on the site.
 - h. The erosion hazard setback (EHS) lines are shown offset from the 100 year floodplain limit line on the north boundary and also from the modified 100 year floodplain limit line on the south boundary. The ERR on the south side relates to pre-development conditions.
5. The downstream conditions of the property are essentially the same as the upstream conditions. The flow quantities, in both the wash along the north boundary and the one along the south boundary, are largely unaffected by the subject property as the site is small in area and the site is natural, and so the quantity of flow is the same at the exiting point as it is at the entering point. The wash on the northwest boundary continues downstream in a channelized section. The wash along the south boundary continues downstream in a natural segment and a channelized segment.

I-D. BIOLOGICAL RESOURCES

1. Exhibit I-D.1 shows that the entire property lies within the Conservation Land System (CLS). There is Important Riparian Area (IRA) along the northwest boundary in the amount of 1.32 acres, as well at the very southeast corner in the amount of 0.02 acres. The remaining 8.44 acres is designated as both Multiple Use Management and Special Species Management areas.
2. The property is not within or adjacent to one of the Critical Landscape Connections.
3. The property is not within the Priority Conservation Area for the Pima Pineapple Cactus.
4. The property is not within the Priority Conservation Area for the Needle-spined Pineapple Cactus.
5. The property is entirely within the Priority Conservation Area for the Cactus Ferruginous Pygmy-Owl (Priority 1) but not at all for the Western Burrowing Owl.





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Exhibit I-D.1
 Conservation Land
 System Map

6. The Arizona Game & Fish Department Heritage Data Management System report for the subject property is enclosed in the WestLand Resources 'Special-Status Species Memorandum' found in this Report as Appendix #2. The relevant information is found at the top of Page 7 of 11 of Attachment A. It shows a number of Special Status Species known to exist within a 3 mile radius of the subject property. Those species are the Fulvous Whistling-Duck, the Cactus Ferruginous Pygmy-owl, the Sonoran Desert Tortoise, the Lesser Long-nosed Bat, and the Tumamoc Globeberry. The Westland Resources memo in Appendix #2 indicates that there is no potential for the fulvous whistling-duck to occur at the property, it is unlikely for the cactus ferruginous pygmy-owl to occur at the property, the Sonoran desert tortoise could occur as a transient, the lesser long-nosed bat could forage on saguaro flowers and fruits at the property, and the Tumamoc globeberry could occur at the property.
7. Westland Resources has performed a field survey to identify the location of all onsite Saguaros and Ironwoods. The results are depicted on Exhibit I-D.7/9.
8. The Sonoran Desert Conservation Plan MapGuide classifies the property as Habitat Protection-Highest Priority under both the 2004 and the Proposed 2010 Conservation Bond Program, although due to a lack of funds and priority this parcel has not been purchased.
9. The issue of whether there are any areas onsite where the vegetation is especially important for scenic value, or for screening and / or buffering, and soils stabilization is mostly a matter of perspective. From a community perspective the answer is 'no', as none of the subject property is visible from beyond the immediately adjacent properties. Only from the perspective of the immediately abutting property owner might there be a negative impact by the loss of natural vegetation on the subject property, but that doesn't mean the owners of these properties have a right to that view, as long as the subject property remains in private hands. Nevertheless with the preservation of the vegetation within the IRA along the north those homeowners to the north will have their views preserved and or mitigated
10. Exhibit I-D.10, i.e. the Vegetative Communities Map, shows the entire property to be located within the Arizona Upland Subdivision of the Sonoran Desertscrub plant community. Due to past impacts to construct the drainage channel along the northwest edge within the IRA, and subsequent recreational use of the area, the riparian plant community along the wash has been substantially degraded and a significant portion of the land beside the channel within the IRA has been denuded of vegetation. WestLand Resources staff visited the area on January 15, 2015, and observed that the dominant tree species across the site are Ironwood and Foothill Palo Verde mixed with a smaller number of Velvet Mesquite and Blue Palo Verde. There is a large number of cacti representing a range of species including Saguaro, Prickly Pear, Teddy Bear Cholla, Chain Fruit Cholla and a limited number of Fish-hook Barrel Cactus, Fish-hook Pincushion and Christmas Cholla. The dominant shrub species is Creosote Bush. The dominant understory plant and the plant species that is probably most frequently found across the site is Triangleleaf Bursage. Plants are uniformly spaced across the site except where informal footpaths have been formed or where the site was disturbed by previous construction activity.

I-E. VIEWSHEDS

1. The Cluster Option will not be utilized and therefore this section will not apply.
2. See Exhibit I-E.2, for photos of the site, taken both on and off site.

Legend:

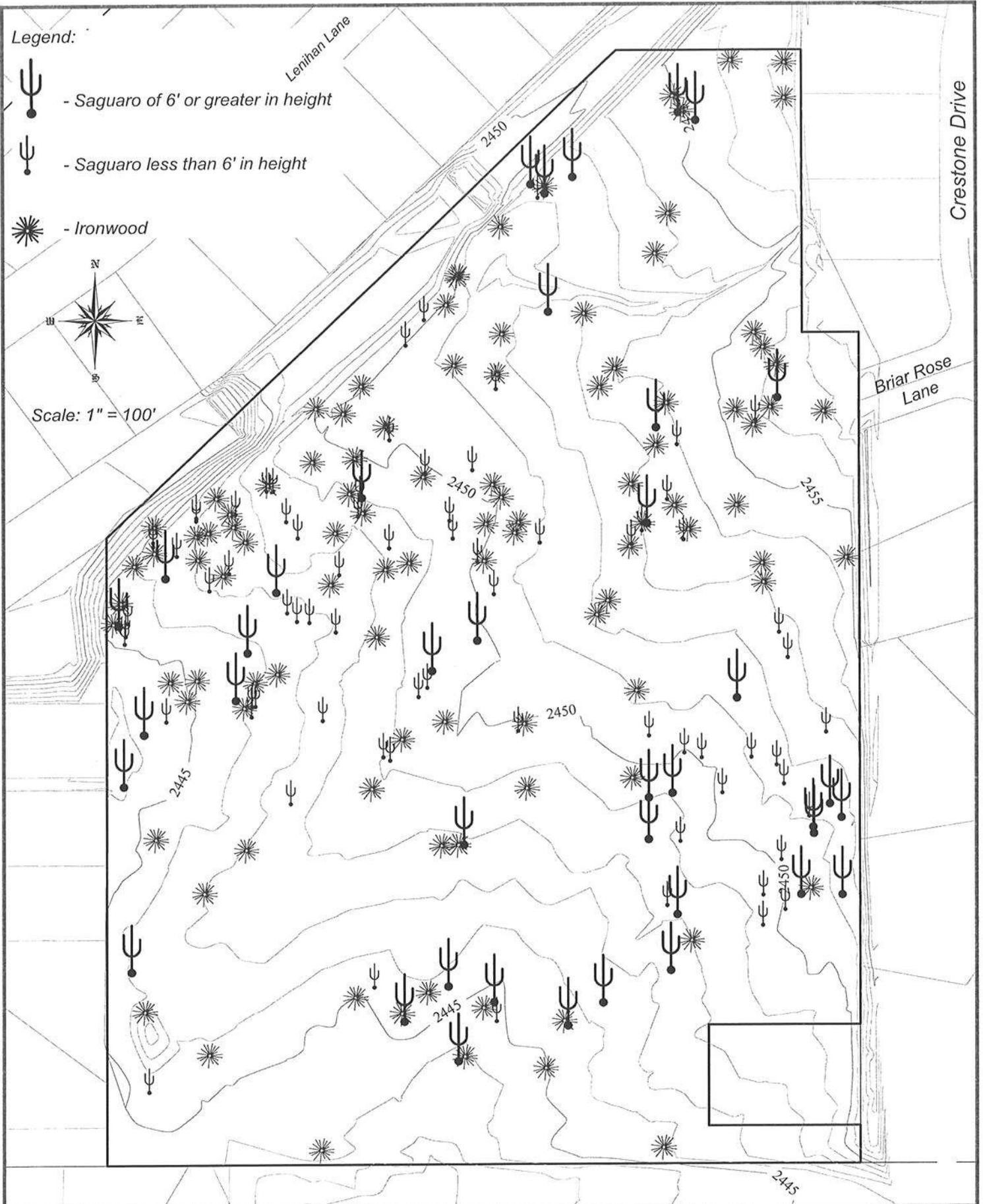
 - Saguaro of 6' or greater in height

 - Saguaro less than 6' in height

 - Ironwood



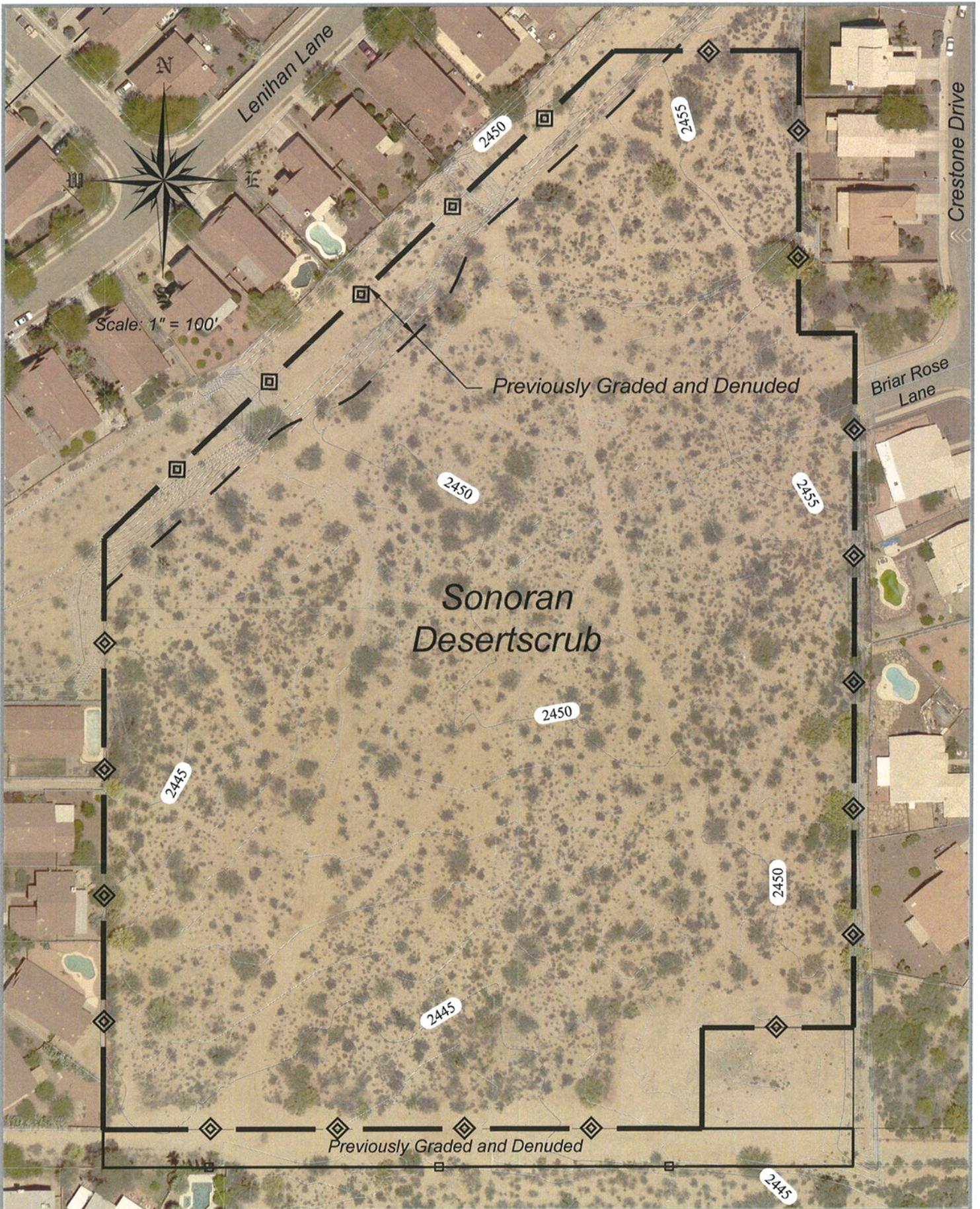
Scale: 1" = 100'



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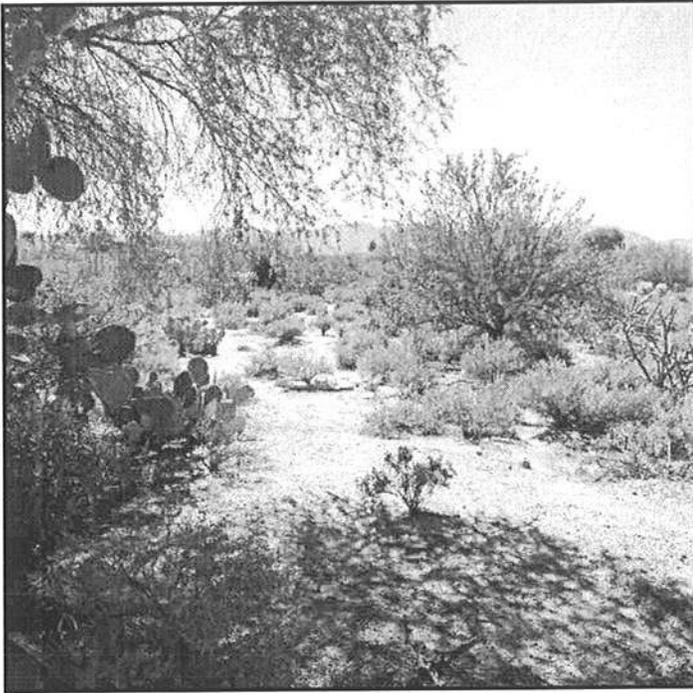
Exhibit I-D.7/9
Special Species Map



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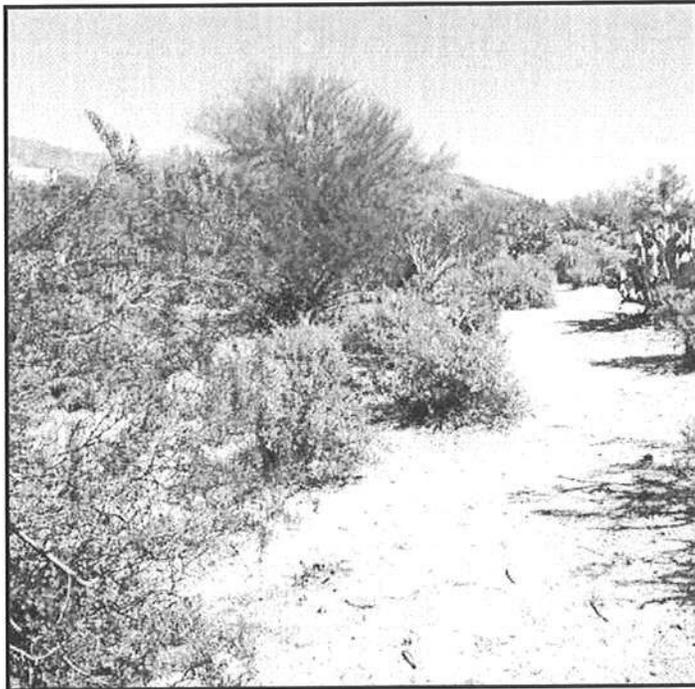
Exhibit I-D.10
Vegetative Communities
Map



From East Boundary



From North Boundary



From West Boundary



From South Boundary

I-F. TRANSPORTATION

1. The property has direct access onto Crestone Drive by way of Briar Rose Lane which is stubbed into the subject property. Briar Rose Lane was platted as part of the Las Lindas subdivision to the east. The purpose of establishing this stub street, i.e. Briar Rose Lane, was strictly for the purpose of providing access to the subject property. Access from the subject property to a roadway on the Major Streets & Routes Plan is by way of Briar Rose Lane to Crestone Drive to Highline Ave to Linda Vista Boulevard. Exhibit I-F.1 shows these roads. Exhibit I-F.2 shows all roads within 1 mile of the subject property which are designated on the Major Streets & Routes Plan (MS&R). Those roads are Linda Vista Boulevard, Thornydale Road and Shannon Road. All of these roads are categorized as 'Scenic Routes', except for the segment of Linda Vista Blvd west of Thornydale which is categorized as a 'Major Route'.

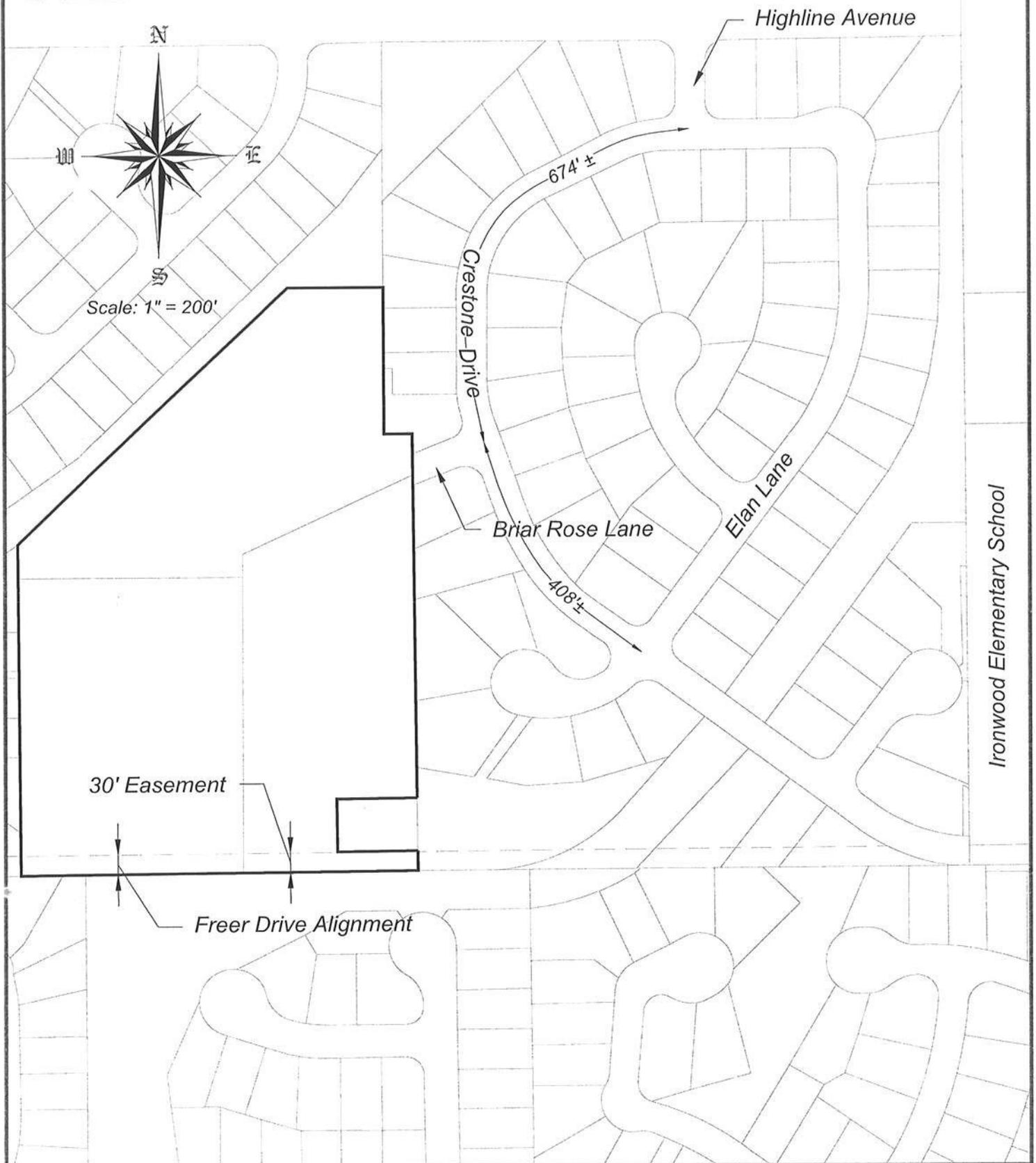
Linda Vista Boulevard

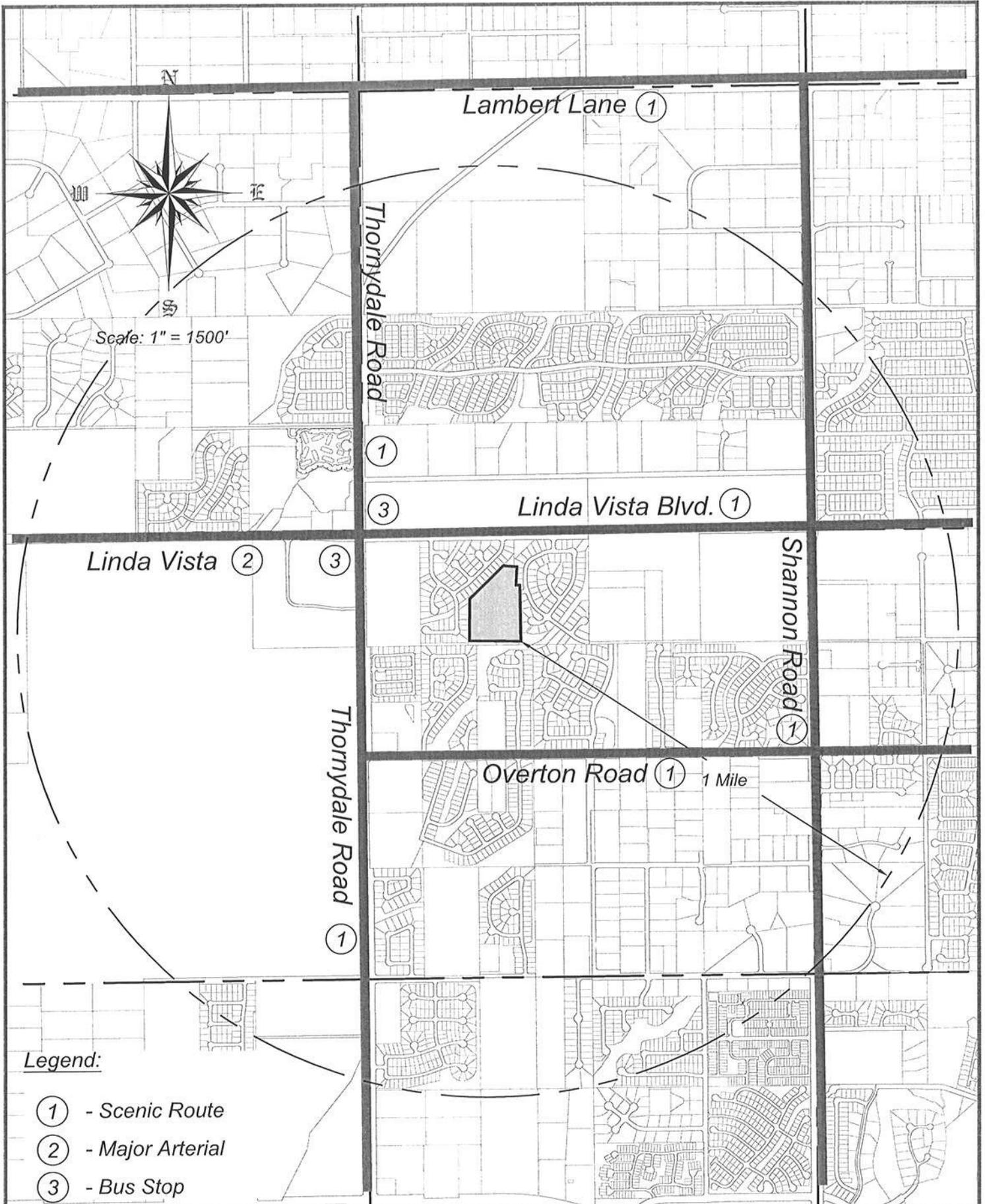
- a. The existing right-of-way varies for the segment within the 1 mile radius. West of Thornydale the full r/w is 110 feet. East of Thornydale the r/w width varies from nothing (to the east for a short segment) to 80 feet (east of Shannon Road).
- b. The ultimate right-of-way per the Major Streets & Routes Plan is 150 feet. There are segments that remain to be dedicated, which would happen when the adjacent properties are developed. There are other segments where the adjacent land has been developed but with a reduced half right-of-way dedication.
- c. Linda Vista Blvd is continuous from Twin Peaks Road, about 3 ¼ mile to the west and only for about 400 feet to the east where the roadway and right-of-way disappears. The right-of-way starts up again about 1300 feet further to the east.
- d. See the sub-section below entitled 'Proposed Off-site roads'.
- e. The roadway consists of two travel lanes and dirt shoulders, without any curbs or bike lanes or sidewalks. There is a westbound center left turn lane for movements onto Thornydale Road. The posted speed limit is 35 MPH. The capacity for such a roadway is 13,122 average daily trips (ADT).
- f. There are no existing counts for the segment east of Thornydale Road, in the vicinity of the subject property.
- g. There are no bike or pedestrians paths along the roadway.
- h. There are no roadway improvements planned per the Pima County 5 Year Transportation Plan.

Thornydale Road

- a. The existing right-of-way varies for the segment within the 1 mile radius. North of Linda Vista Blvd the right-of-way varies from 90 to 150 feet. South of Linda Vista Blvd it varies from roughly 85 to 100 feet.
- b. The ultimate right-of-way per the Major Streets & Routes Plan is 150 feet. Most segments of this roadway have deficient right-of-way widths.
- c. Thornydale Road is continuous from Moore Road, to the north about 4 miles, to Orange Grove Road, to the south about 3 miles to the south, where it changes name to River Road.
- d. See the sub-section below entitled 'Proposed Off-site roads'.
- e. The roadway currently consists of two travel lanes and dirt shoulders. However, the segment between Linda Vista Blvd & Overton Rd is funded and scheduled for improvements to essentially match what exists on Thornydale Road south of Overton Road. That new cross-section will consist of 4 travel lanes, two on either side of a raised median, and within a paved shoulder. This improved roadway will have a capacity of 34,000 vehicles per day. The posted speed limit is 45 MPH.

Linda Vista Blvd. (MS&R Scenic Route)





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 Section 20, Township 12 South, Range 13 S,
 Pima County, Arizona

Exhibit I-F.2
 Major Routes Map

- f. According to the Pima County Department of Transportation traffic volume online report, based on the 2013 count, Thornydale Road between Overton Road and Linda Vista Boulevard has an average daily two-way traffic of 18,193 trips.
- g. Currently there are no bike or pedestrian paths along the roadway, except for a small segment of bike lane in both the northbound and southbound approaches to the Linda Vista Boulevard intersection. However, when widened the paved shoulders will accommodate a bike lane.
- h. According to the PAG 5 Year Transportation Improvement Plan, Thornydale Road will be widened to 4 travel lanes, from Cortaro Farms Road to Linda Vista Boulevard in the years 2018 & 2019.

Shannon Road

- a. The existing right-of-way varies for the segment within the 1 mile radius. The width is as narrow as 50 feet and as wide as 150 feet.
- b. The ultimate right-of-way per the Major Streets & Routes Plan is 150 feet. There are therefore segments that will have additional right-of-way dedications over time.
- c. Shannon Road is continuous from Naranja Drive, to the north for about 2 miles, to the Cortaro Farms Road / Magee Road intersection, roughly 2 miles to the south.
- d. See the sub-section below entitled 'Proposed Off-site roads'.
- e. The roadway consists of two travel lanes and dirt shoulders, without any curbs or bike lanes or sidewalks. There is a southbound center left turn lane at Overton Road. The posted speed limit is 40 MPH. The capacity is 15,930 average daily trips (ADT).
- f. According to the Pima County Department of Transportation traffic volume online report, based on the 2012 count, Shannon Road between Overton Road and Lambert Lane has an average daily two-way traffic of 7,637 trips.
- g. There are no bike or pedestrian paths along the roadway.
- h. There are no roadway improvements planned per the Pima Co 5 Year Transportation Plan.

Proposed Offsite Roads

- a. There are no new 'proposed offsite roads'.
- b. Briar Rose Lane connects to Crestone Drive. Crestone Drive is a residential street, built to serve the capacity of the Las Linda subdivision and the anticipated development of the subject property. The results of an analysis performed during the Plan Amendment resulted in a confirmation that Crestone Drive can handle the existing traffic from within the Las Lindas subdivision and the anticipated traffic from the subject property and even the counted cut-thru traffic to and from the elementary school. This conclusion was accepted by the Pima County Department of Transportation. See Appendix #3A for the letter from Michael Marks to Pima County and Appendix #3B for the letter from the Department of Transportation.
- c. Freer Drive is the name of the access & utility easement along the south boundary of the subject property. This easement, from Thornydale Road east to the subject property, is 30 feet wide, first adjacent to undeveloped land and then adjacent to a developed subdivision. The 30 foot width is too narrow to be converted to a public roadway or right-of-way, which has been the subject of a question raised by some neighbors.

2. Exhibit I-F.1 shows the location of Briar Rose Lane relative to the nearest two intersections. The distance between Briar Rose Lane and Elan Lane is about 400 feet to the south. The distance between Briar Rose Lane and Highline Ave is about 675 feet to the north.
3. Sun Tran bus route #412 that runs on Thornydale Road. There are two bus stops at Linda Vista Boulevard, one at the northeast corner and the other at the southwest corner.

I-G. SEWERS

1. Exhibit I-G shows an existing 8" public sewer line (i.e. G-84-024) running along the southern border of the property, and manhole 4201-20-3 near the center of the south boundary.
2. There are no conditions that would prevent designing and using a gravity sewer system.

I-H. RECREATION AND TRAILS

1. Exhibit I-H shows two public parks within one mile of the property. The Pima County Arthur Pack Regional Park is located about 1250 feet to the southwest. It contains substantial active recreation areas, e.g. baseball fields & golf course, and passive recreation, e.g. natural areas and trails, including the Maeveen Behan Desert Sanctuary Trailhead). The Linda Vista Mobile Home Neighborhood Park lies to the east by about a mile. It contains several facilities including a basketball court & playground.
2. The Pima Regional Trail System Master Plan shows two trails within 1 mile, those being the Hardy Wash Trail (#160) and the other being the Shannon Road Trail (#174).

I-I. CULTURAL RESOURCES: ARCHAEOLOGICAL AND HISTORIC SITES

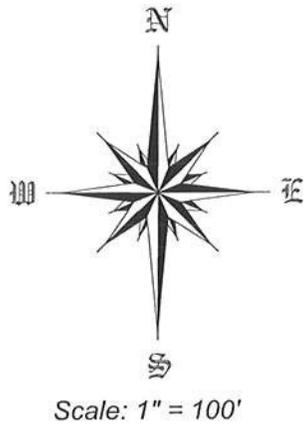
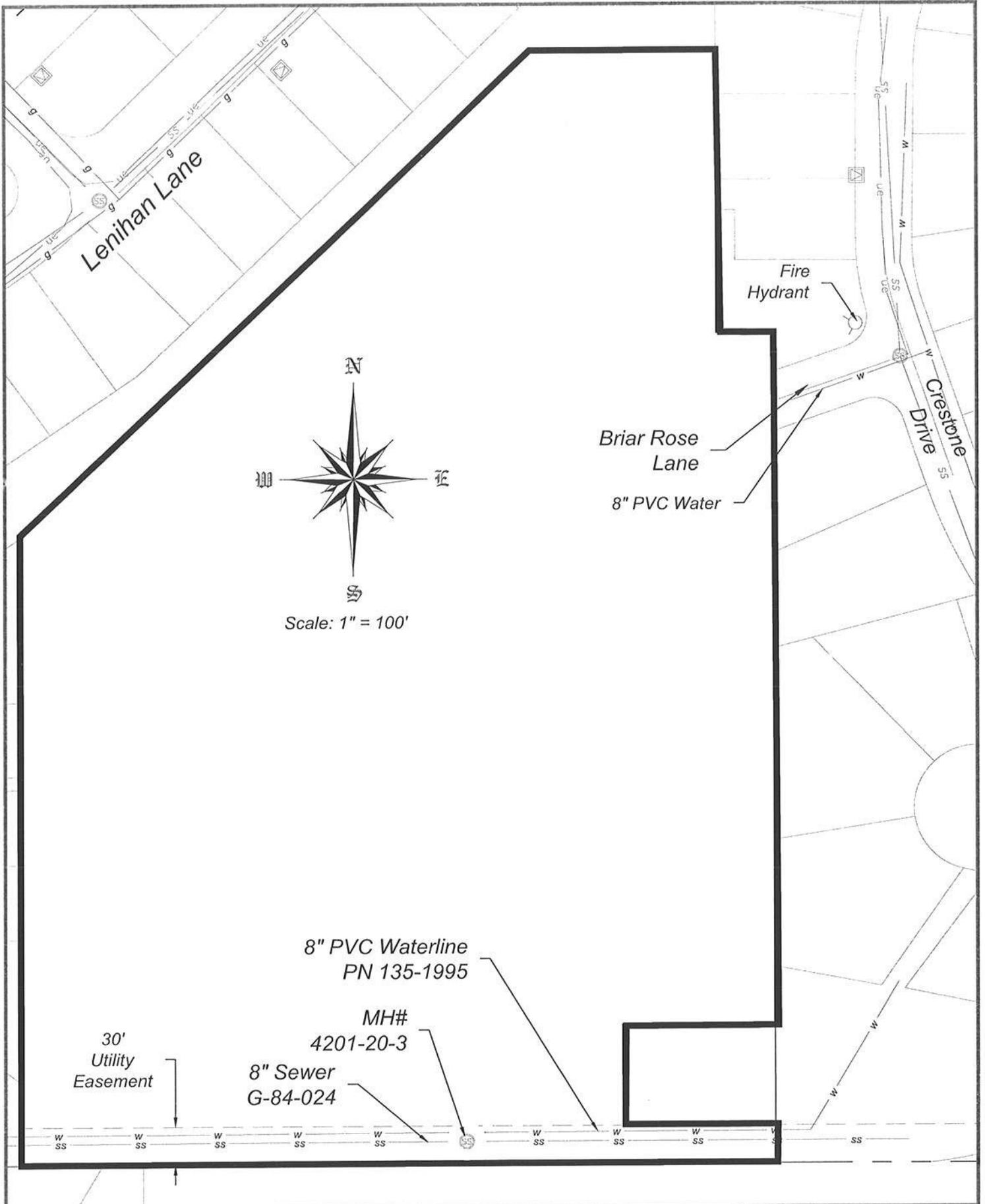
1. The firm of P.A.S.T. prepared an archaeological report on the property entitled 'Archaeological Survey of the West Freer Drive Project Near Marana, Pima County, Arizona', dated January 12, 2015, and with PAST No. 142040. It indicates that there is no record of any prior found resources. The Report says in part "There were no surface indications of archaeological resources within the study area which meet the Arizona State Museum minimum standard for recording as an archaeological site or that would be eligible for inclusion in the National Register of Historic Places." It goes on to say "development of the inspected parcel will not have a negative impact on important cultural resources within or in close proximity to the study area."
2. Based on the results of the archaeological study there is nothing to describe or map.
3. The PAST report includes recommendations concerning cultural resources actions, but Pima County's Office of Sustainability and Conservation, Cultural Resources Division, has the authority to determine which cultural resources actions are required to meet compliance requirements prior to ground modification activities. Pima County has reviewed the PAST survey report and agrees with the recommendations that since no significant cultural resources were identified within the subject property, the proposed development will have no effect to cultural resources and no additional cultural resources work will be required for construction within the development property as it is currently defined.

I-J. AIR QUALITY

1. As this project is residential this section does not apply.

I-K. COMPOSITE MAP

Exhibit I-K.1 graphically integrates the significant site features identified in the Report. It shows the FEMA Floodplain & local 100-year floodplain, the erosion hazard setback, and the regulated riparian areas. It also shows the location of the saguaros and the ironwoods. There are no other features listed in the checklist that apply. In addition to the paper copy of the Composite map there is an acetate overlay of the same (i.e. Exhibit I-K.2) which can be used over the Preliminary Development Plan. This overlay does not have topography since there are no significant topographic features.



30'
Utility
Easement

8" PVC Waterline
PN 135-1995

MH#
4201-20-3

8" Sewer
G-84-024

Fire Hydrant

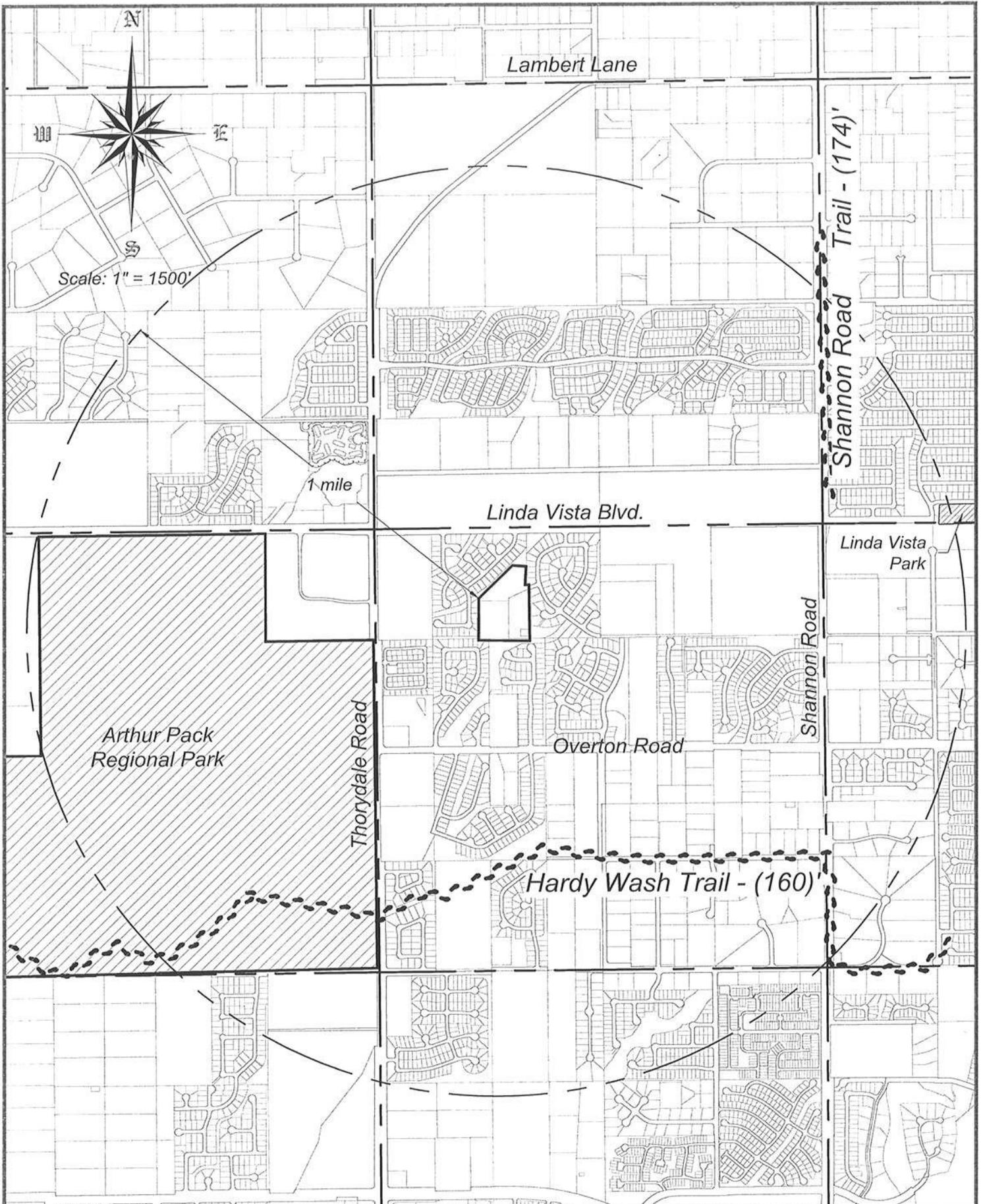
Briar Rose Lane

8" PVC Water

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Exhibit I-G
Utility Map



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 Pima County, Arizona

Exhibit I-H
 Parks and Trails Map

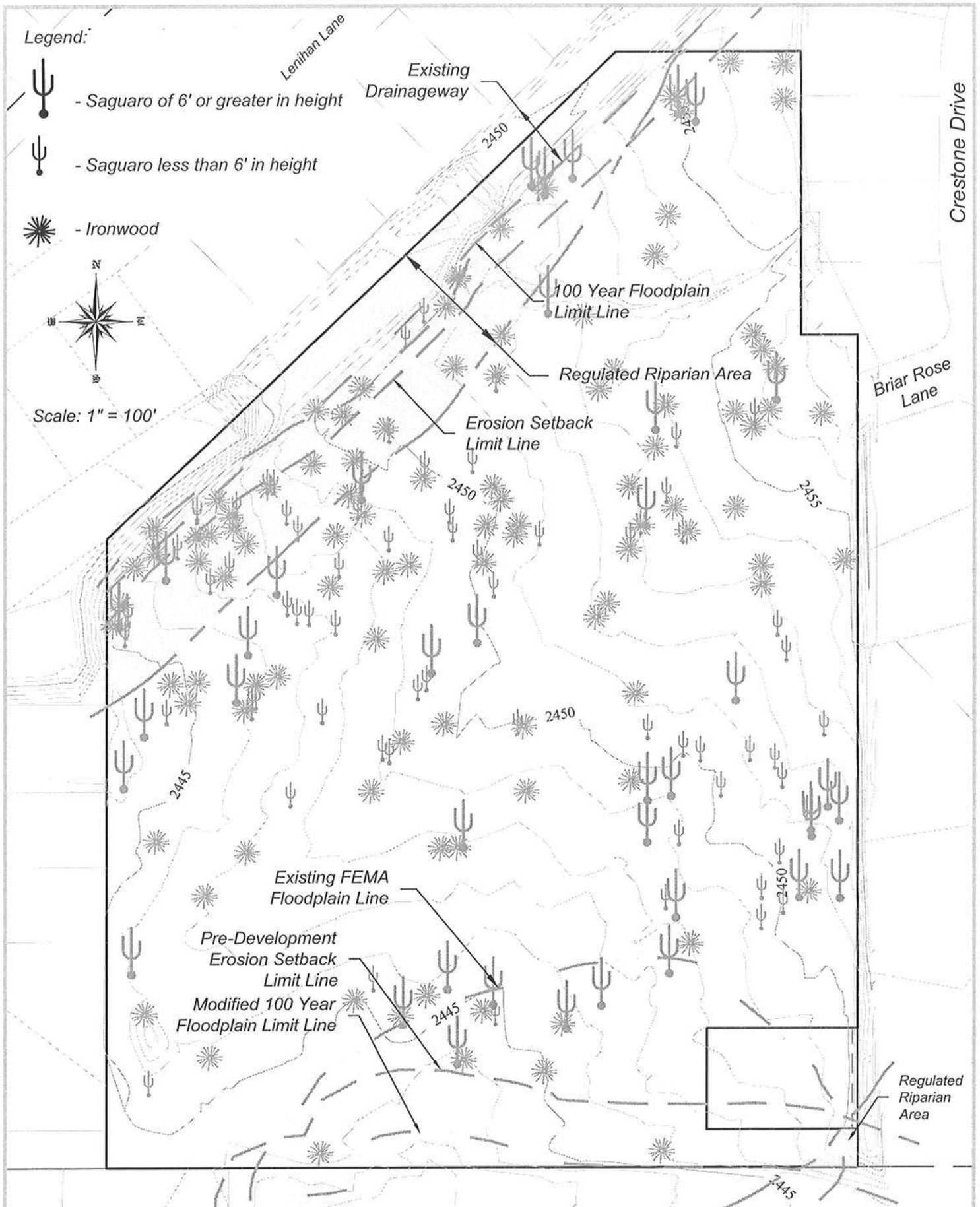
Legend:

-  - Saguaro of 6' or greater in height
-  - Saguaro less than 6' in height

 - Ironwood



Scale: 1" = 100'



Legend:

 - Saguaro of 6' or greater in height

 - Saguaro less than 6' in height

 - Ironwood



Scale: 1" = 100'

Existing
Drainageway

100 Year Floodplain
Limit Line

Regulated Riparian Area

Erosion Setback
Limit Line

Existing FEMA
Floodplain Line

Pre-Development
Erosion Setback
Limit Line

Modified 100 Year
Floodplain Limit Line

Regulated
Riparian
Area

Crestone Drive

Briar Rose Lane

PART II LAND USE PROPOSAL

II-A. PROJECT OVERVIEW

1. The entire property in question is to be rezoned from SR to CR-4. There is no need to create a map for this item.
2. The property is to be subdivided into 34 lots for residential development.
 - a. The design of the project started with the identification of the most sensitive property, according to Pima County regulations and policy, and earmarked it for protection. That area is that which is classified by the Conservation Land System (CLS) and the Riparian Habitat Ordinance as Important Riparian Area (IRA) or Regulated Riparian. That IRA property along the northwest border of the property consists of 1.32 acres. So, the preservation of that property was one constraint. The second constraint is the existence of the 30 foot utility easement along the south boundary. That easement was recognized as essentially a 'no touch' area as it would continue to be used by those utility companies which possess utility lines within this easement, those being Tucson Water, with a water main, and Pima County Regional Wastewater Reclamation Department, with a sewer main. The third constraint is that there is one point of potential vehicular access to the site, and that is by way of the existing Briar Rose Lane right-of-way and roadway. The project design recognizes these constraints. This design then uses the remainder of the property in a manner consistent with the zoning requested and a land use type consistent with that in the surrounding area.
 - b. The Preliminary Development Plan shows 34 lots for single family detached housing. The density of this project is 3.48 Residences Per Acre (RAC). This is less than the MIU (Medium Intensity Urban) Plan Designation of 10 RAC. The MIU designation applies to more than 99 percent of the property, with the remaining 0.7 percent designated as RT. That RT area is within the 30 foot easement along the south boundary, ironically already graded by other parties with rights to that easement. One other point about the planned 3.48 RAC density is that it is less than the Draft Pima Prosper Comprehensive Plan Medium-Low Intensity Urban (MLIU) designation which would allow 5 RAC. The Rezoning Policy A, of A-D, referred to in Section I-A.2.c of this Report will be adhered to by the transplanting of onsite plants onto the IRA along the north boundary, and particularly along (but not within) the drainageway (see Sections II-B.1.g and II-E.1.b & c, and II-F.3). Adherence to Policies B-D, which deal with CLS offsite mitigation, is addressed in Section II-E.1a and then described more thoroughly in Appendix #4.
 - c. There was a neighborhood meeting held during the Plan Amendment process, and there were additional conversations with select neighbors. There has not been a neighborhood meeting in context with this rezoning proposal yet, though. Once the Site Analysis Report is approved a neighborhood meeting will be scheduled.
 - d. The Preliminary Development Plan represents a conversion of the property from vacant to developed status for the majority of the property. Already the 30 foot easement along the south boundary, which amounts to about 0.41 acres, is graded and will remain as such. Along the north boundary the IRA, which amounts to 1.32 acres, will be left 'as is' except for the short swale (approx. 2' deep by 6' wide) to carry drainage from the

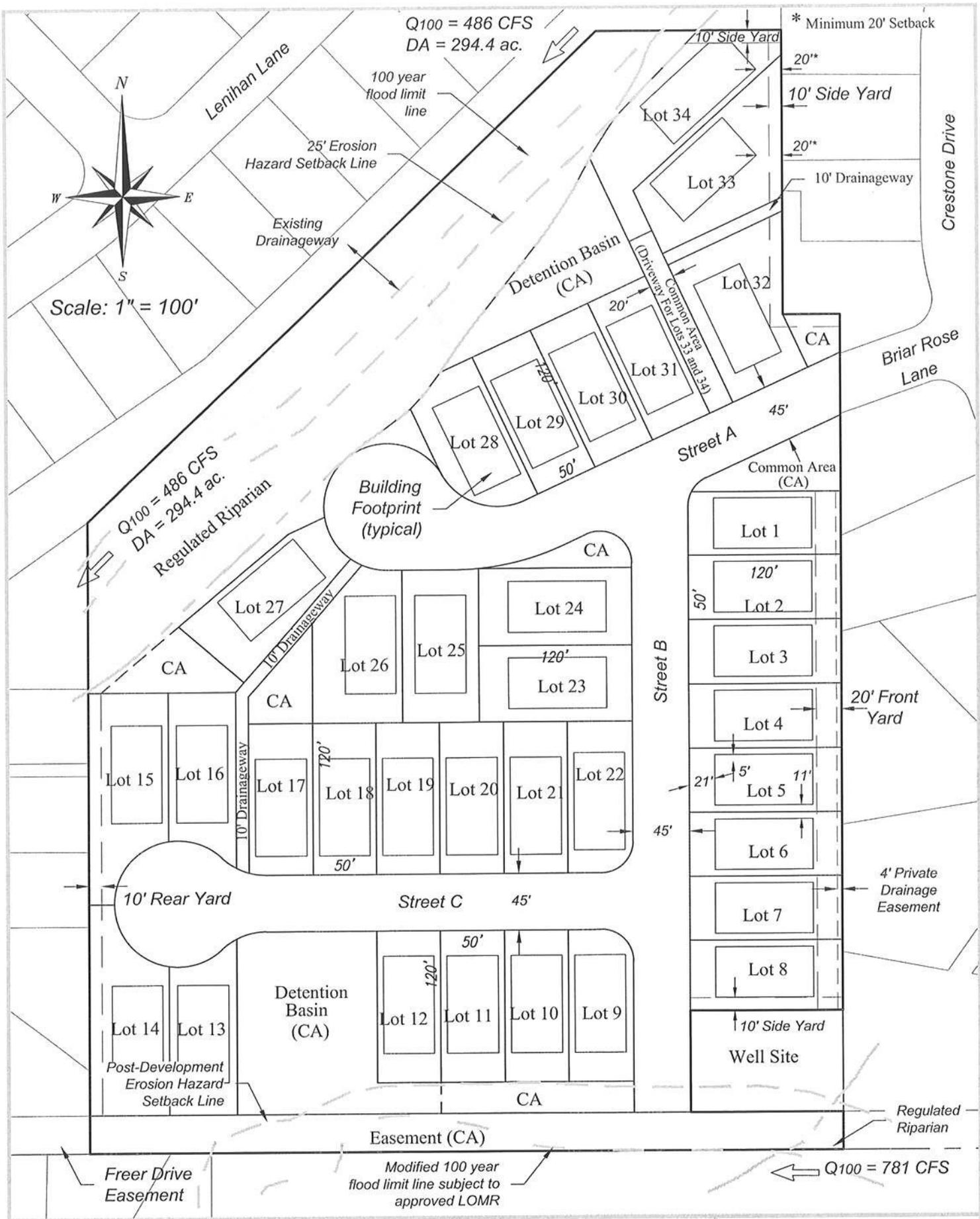
detention basin to the drainageway. The IRA area is composed of the existing & previously graded drainageay (approx. 0.5 acres) and the natural area southeast of the 'top of bank' (as noted on Exhibit II-C.3). Additionally there is 0.08 acre of additional land next to the northerly IRA, classified as MIU, which will be left natural. That leaves 7.97 acres which will be graded for residential development. This planned development is the same as that on nearly all of the property within a one-quarter mile radius. The only exceptions are the properties north of Linda Vista Blvd and at the southeast corner of Thornydale Rd & Linda Vista Blvd, which are currently vacant, and the elementary school to the east, and the commercial development at Thornydale Road and Overton Rd.

- e. The development of the property as planned is consistent with Growing Smarter principles in a number of ways. The development of the subject property constitutes infill, as it is situated in a suburban context. The development constitutes 'compact development' as defined by the Smart Growth Network. This classification is possible because of the preservation of the natural open space along the north boundary, another smart growth principle. This open space makes up about 14 percent of the property. The proposed project conforms to another principle which calls for 'fair and cost effective' development, made possible by the proximity to existing utilities and other infrastructure. Lastly the project will be a walkable neighborhood with a path created within the northerly Common Area, and sidewalks built along all streets, and the southerly common area open for pedestrian use.
 - f. There are no plans to utilize solar energy systems, however the separation between units would allow for solar access should the individual homeowner choose to add solar energy after his/her purchase. Additionally, the orientation of the majority of the homes, with the long side running north-south, is preferable for solar use. The builder will comply with the County's Green Building Program.
3. The property is not subject to 1) Buffer Overlay Zone, 2) the Gateway Overlay Zone, 3) the Hillside Development Zone, 4) the Cluster Development Option, 5) the Historic Zone, or 6) the Airport Environs and Facilities Zone. It is, however, subject to the Native Plant Preservation Ordinance (NPPO). Compliance will be achieved by the 30% set-aside, factoring in the offsite mitigation land, being left natural. The plan also is to transplant as many of the onsite and affected saguaros and ironwoods as possible to the northerly IRA area (consistent with Rezoning Policy A) and the multiple small common area pieces designed for water harvesting, in order to accommodate the 80% rule.

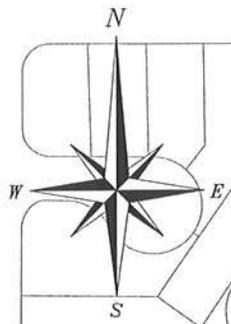
II-B. PRELIMINARY DEVELOPMENT PLAN

1. Exhibit II-B.1a depicts the Preliminary Development Plan with topography. Exhibit II-B.1b is the same but without the topography, and in the form of a removable transparency overlay. These exhibits address all of the elements identified in Section II-B.1 of the Checklist, covering the same elements as identified in Zoning Code Section 18.91.030E, to the extent that they apply. The following is provided for clarification:
 - a. The site boundaries and the preliminary lot dimensions are shown.
 - b. A typical house footprint is shown on each lot (on Ex. II-B.1b).
 - c. The adjacent Briar Rose Lane right-of-ways is shown, as is the intersection with the Crestone Drive right-of-way is.

- d. The one future point of access, i.e. Briar Rose Lane, is shown. Also shown are all of the internal streets. Those streets will be designed to comply with Pima County Street Standard 4.1. As such all streets will contain sidewalks on both sides. Additionally there will be room for pedestrian paths within the northwest common area and the 30 foot south boundary easement (See Exhibit II-H.5).
 - e. Parking will be accommodated within garages, as well as in the driveway.
 - f. There are no required buffers or screening or walls due to the like zoning with that on the adjacent properties. However, the large piece of common area along the north boundary and the 30 foot easement along the south boundary will both act as buffers.
 - g. The small common areas within the project will be used primarily for water harvesting, but also will be landscaped. The large common area along the north boundary will be left natural but will also be enhanced with transplanted specimens from elsewhere onsite (consistent with Rezoning Policy A).
 - h. There are no recreation areas being provided by this plan. There are common areas with the one large piece along the north boundary being natural. They are shown on the Plan.
 - i. The existing drainage conditions along the northwest border will remain as is. The existing drainageway & 100 year floodplain & associated erosion hazard setback are all contained within the common area boundary. The 100 year floodplain that just encroaches minimally into the very south boundary will not be impacted by the development. It exists within the 30 foot utility easement which will not be modified. The Erosion Hazard Setback on this south side will be modified by the grading on Lots 10-12 and specifically the bank protection on the south sides of those lots which will remove them from conflict with this setback. The Plan shows a proposed drainageway within the project designed to carry onsite runoff from the northerly cul-de-sac southerly to a new detention basin.
 - j. The only such significant features are the existing drainageway and IRA area on the north boundary and the 30 foot easement along the south boundary, and they are all identified.
 - k. All of the development within 300 feet is residential is zoned CR-4 or CR-5 or TR. Exhibit II-B.1.k shows the PDP with all properties within 300 feet. That exhibit identifies the lots with two-story homes.
 - l. This point is moot as there are no such trails.
 - m. The 30 foot Utility Easement along the south boundary, and the 40 foot Drainage Easement on the north boundary, are identified.
 - n. This point is moot. Sewers will be utilized.
 - o. This point is moot. There are no overlay zones.
 - p. This point is moot. There are no transit stops.
2. The following support data is provided:
 - a. Not applicable
 - b. The maximum building height will be 34 feet and two stories, per the Zoning Code.
 - c. The total number of dwellings is 34.
 - d. The density is 3.48 RAC.
 - e. Each dwelling will contain the required parking spaces onsite as determined by Line 1a of the Zoning Code Table 18.75-1.



Linda Vista



Scale: 1" = 200'



Legend:
② - Two Stories

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Exhibit II-B.1k
PDP with 300'
Coverage

- f. The landscape will be primarily characterized as 'desert', in compliance with the County's approved plant list.
- g. The Preliminary Development Plan contains both natural (land in its natural state plus land previously graded but to be left 'as is') and functional open space. The natural open space is located along the northwest border in the IRA, including the drainageway, and immediately adjacent to the IRA, and makes up 1.42 acres. The southerly 30 foot easement will also be left 'as is' and it makes up 0.41 acres. Additionally there is functional open space within the several pieces of common area within the project, combined making up 0.8 acres, and in the two detention basins making up an additional 0.59 acres. While these numbers are preliminary they are expected to be very close to the final numbers generated during the platting process.
- h. Not applicable.
- i. One additional piece of information that is not in the County's Checklist is that of setbacks. As setbacks are taken from the site perimeter in a CR-4 subdivision, and given that the front yard is the border through which access comes, the 20 foot front yard applies to the easternmost border, and all other borders, be they a side or the rear, are subject to a 10 foot setback. These setbacks are shown on Exhibit II-b.1.b. As Lots 33 & 34 have substantial depth a special 20 foot setback is indicated.

II-C. TOPOGRAPHY AND GRADING

1. The site does not contain any slopes of 15 percent or greater.
2. There is no need to set aside natural area as a result of the Hillside Development Zone.
3. The conditions after grading amounts to the following and are depicted on Exhibit II-C.3:
 - a. The natural open space, or area to be left 'as is', consists of the open space/common area along the north boundary and the 30 foot easement area on the south boundary. All of these properties amount to approximately 19 percent of the site. Exhibit II-C.3 breaks this area down into two sub-groups, that which was previously graded but will be 'left as is' by this development (i.e. the drainageway along the north boundary and the 30 foot easement along the south boundary), and that which has not previously been graded nor will it be graded by this development, but will be subject to plant enhancement (i.e. the remainder of the northerly open space/common area outside of the existing drainageway).
 - b. Approximately 14 percent of the project will be graded and then revegetated.
 - c. That leaves the remaining 67 percent of the property that will be graded to accommodate the residential development.
4. No cuts or fills of 5 feet or greater are expected.
5. The 'cluster option' will not be used.

II-D. HYDROLOGY

1. The PDP respects the hydrologic conditions on the north/northwest border. The Common Area/Open Space along that border contains the existing channel, the 100 year floodplain, the erosion hazard setback, and all of the Regulated Riparian area. The 100 year floodplain along the south boundary is contained within the 30 foot Utility Easement. The erosion hazard setback does encroach into Lots 10-12 which either will be avoided by the house footprint or there will be bank protection installed along the south side of each lot. The floodplain in both cases will not be impacted by the proposed residential development. Other than for these two wash/floodplain



Scale: 1" = 100'

Lenihan Lane

Top of Bank

Discharge Swail

Legend:

-  Natural Area subject to plant enhancement
-  Area Previously Graded and to be left as is.
-  To be graded and revegetated
-  To be graded for development

Briar Rose Lane

Street A

Street B

Street C

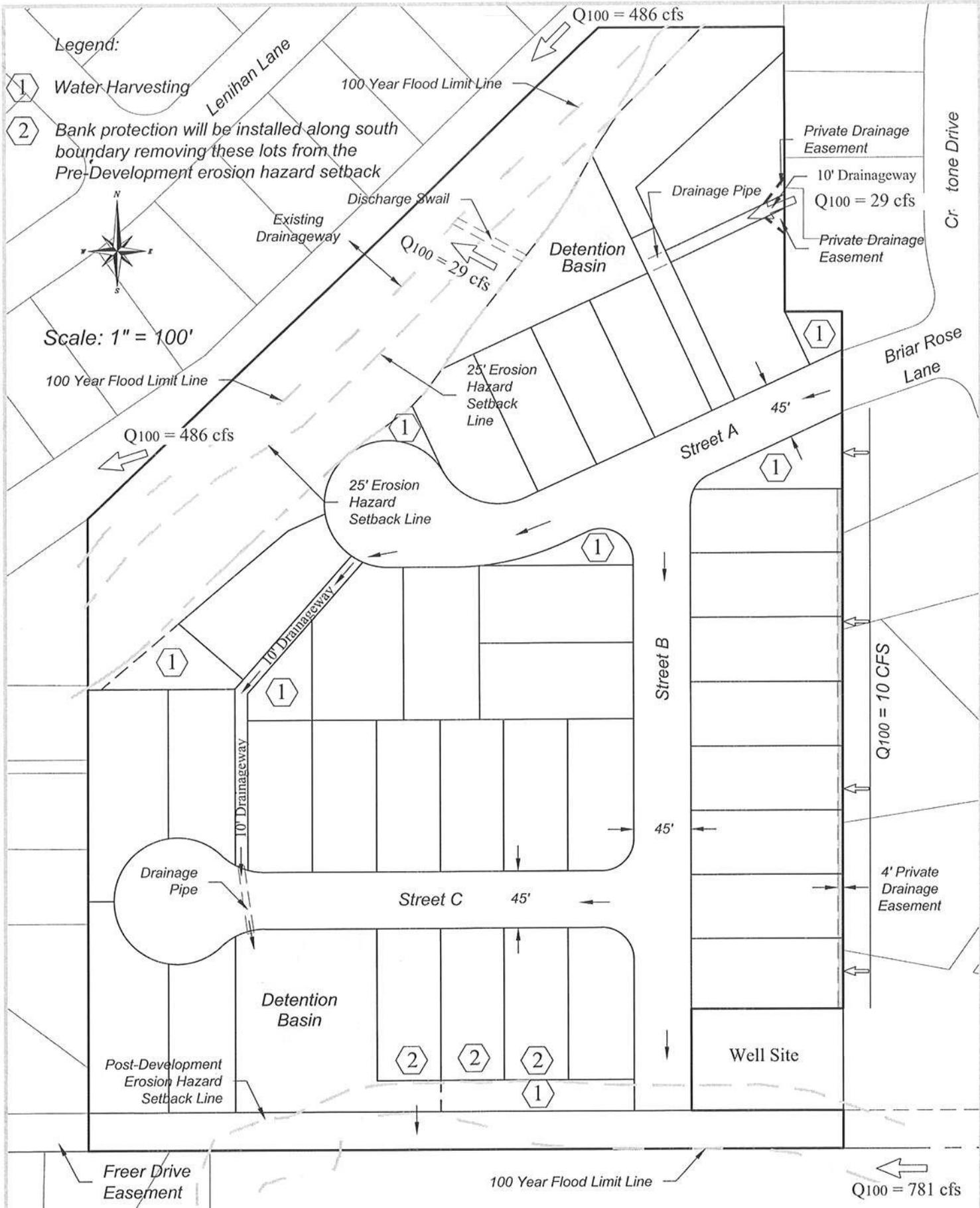
Edge of Pavement south of which is Decomposed Granite

areas there is offsite flow entering the site along the east boundary near proposed Lots 32 & 33. At that location runoff discharged from the adjacent detention basin will be captured and funneled into a drainageway which will carry the runoff to a pipe system under the joint driveway serving Lots 33 & 34 and then into a detention basin which ultimately will discharge the runoff to a swale running through the Common Area leading to the bank of the drainageway along the north boundary. There is a minor additional amount of offsite flow running off the back slopes of the lots to the east and south of Briar Rose Lane which will be collected in a narrow & shallow drainageway within and along the east border of Lots 1-8 which will carry that flow to the south to be discharged into the wash to the south. This drainage plan will result in no negative impacts to hydrologic conditions up or downstream.

2. There is no encroachment into either of the two applicable 100 year floodplains due to the project plan. The floodplain along the north boundary will completely be avoided. The one along the south boundary was previously graded for that small portion that encroaches onto the subject property, with that grading performed by others who have rights to the utility easement, with the purpose being the installation of public utilities and access to those utilities and to the City Well site. The impacts of development onto each of these two floodplains will be mitigated by the construction of two detention basins which will reduce the increased onsite discharges back to pre-development rates.
3. Exhibit II-D.3 shows the quantity of flow for the washes along the north/northwest boundary and the south boundary, entering and exiting the property. Those numbers are the same as under pre-development conditions. Any increase in peak discharges onsite will be addressed by the two on-site detention basins.
4. Exhibit II-D.3 shows the location and size of the two retention/detention basins. The property wall along the south boundary of Lots 10-12, next to the detention basin outlet system and adjacent water harvesting area, will be constructed to define the edge of the erosion hazard setback.
5. There are no basin management plans or applicable Comprehensive Plan policies that affect this property.
6. The future Homeowner Association (HOA) for the subject project will have the responsibility of maintaining that portion of the drainageway along the north side that is within the north property boundary. Currently the Linda Vista Ridge HOA is presumed to maintain that drainageway within its boundary, that is approximately the north half (and possibly all of it). There is a potential for a joint maintenance agreement, but that is something that will be explored during the platting process.

II-E. BIOLOGICAL RESOURCES

1. See Exhibit II-E.1 for a graphic response to the biological issues in the Checklist.
 - a. The entire site is designated as part of the Conservation Land System. The area designated as IRA is identified and it is all within common area to be left 'as is' (although two caveats need to be made, one being that approximately 0.5 acres was previously graded to construct the drainageway and two, that a small swale will be cut in from the northerly detention basin to the channel) and at the very southeast corner of the site which was graded previously to install utilities and make the surface drive-able. The Multiple Use Management/Special Species Management area will all be disturbed except for a small area along the northerly IRA which amounts to 0.08 acres, and for the 30 foot



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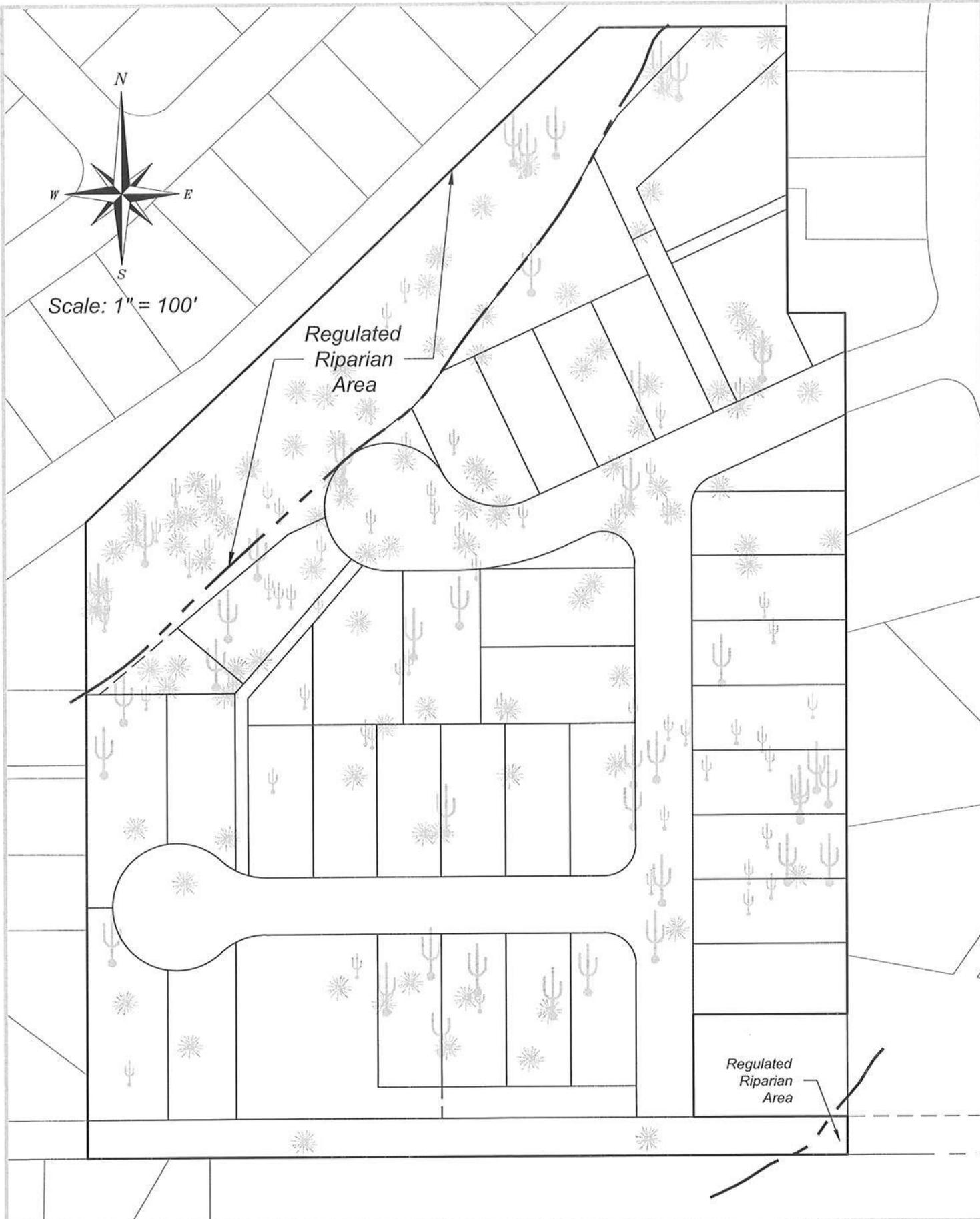
Exhibit II-D.3
Preliminary Drainage
Plan

easement, amounting to 0.41 acres, which was previously graded by others but in regard to the subject property will be left 'as is'. The amount of disturbed MU/SS area is 7.97 acres (although this number may be marginally refined during the platting process). This area will be mitigated by the provision of offsite mitigation land. Such land has been identified and acquisition is underway. This matter is discussed in Appendix #4.

- b. A total of 111 saguaros were counted on the site and are depicted on this exhibit. Approximately 22 are located within the open space within the northerly Common Area and all of them will all be preserved in place. Another 2 exist within the two detention basins and another 1 exists in one of the small pieces of common area and all of them will also be left in place if the grading will allow. Additionally there are a few saguaros within proposed lots that might be able to be left in place due to their locations in back yards or side yards, and that will all depend on the final grading. Of those that cannot be left in place it is estimated that there is more than sufficient space in the northerly IRA area (satisfying Rezoning Policy A) and the detention basins and the small pieces of common areas to accommodate all of the required transplanted onsite saguaros.
 - e. A total of 103 Ironwood Trees were counted on the site and are depicted on this exhibit. Approximately 26 of the Ironwood Trees are located within the northerly IRA area and they will all be preserved in place. Another 3 exist within the two detention basins, another 8 exists within the small pieces of common area, another 2 exists within the southerly 30' easement, and all of them will also be left in place if the grading will allow. Additionally there are a few ironwoods within proposed lots that might be able to be left in place due to their locations in back yards or side yards, and that will all depend on the final grading. Of those that cannot be left in place it is estimated that that there is more than sufficient space in the northerly IRA area (satisfying Rezoning Policy A) and the detention basins and the small pieces of common areas to accommodate all of the required transplanted onsite Ironwoods.
 - d. This point is moot, as the site does not contain any Pima Pineapple Cactus.
 - e. This point is moot, as the site does not contain any Needle-Spined Pineapple Cactus.
 - f. Other than the riparian habitat along the north boundary, which will be preserved, there are no other areas of significant or important vegetation.
2. The proposed development plan maintains the Important Riparian Area along the northwestern boundary by leaving it 'as is', with the minor exception of the swale from the northerly detention basin to the drainageway, which will be revegetated. This one IRA corridor is the only landscape corridor within the subject property. The preservation of this area is greater in proportion than what any of the surrounding subdivisions preserved. Compensation for that portion of the property designated as MU/SS will be achieved through the offsite mitigation plan.

II-F. LANDSCAPE AND BUFFER PLAN

1. Given that the proposed zoning CR-4 and the adjacent zoning is a mixture of CR-4, CR-5 and TR there are no required bufferyards, and therefore none are mapped.
2. No mapping is required or provided in regard to bufferyards. Exhibit II-B.1a is enclosed which shows the Drainage Easement within the northerly open space Common Area.
3. A portion of the Saguaros and Ironwoods onsite that will be impacted by the proposed development will be transplanted into the northerly open space Common Area, consistent with Rezoning Policy A. The final number of such specimens will be determined when the Native



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Exhibit II-E.1
 Biological Impacts
 Map

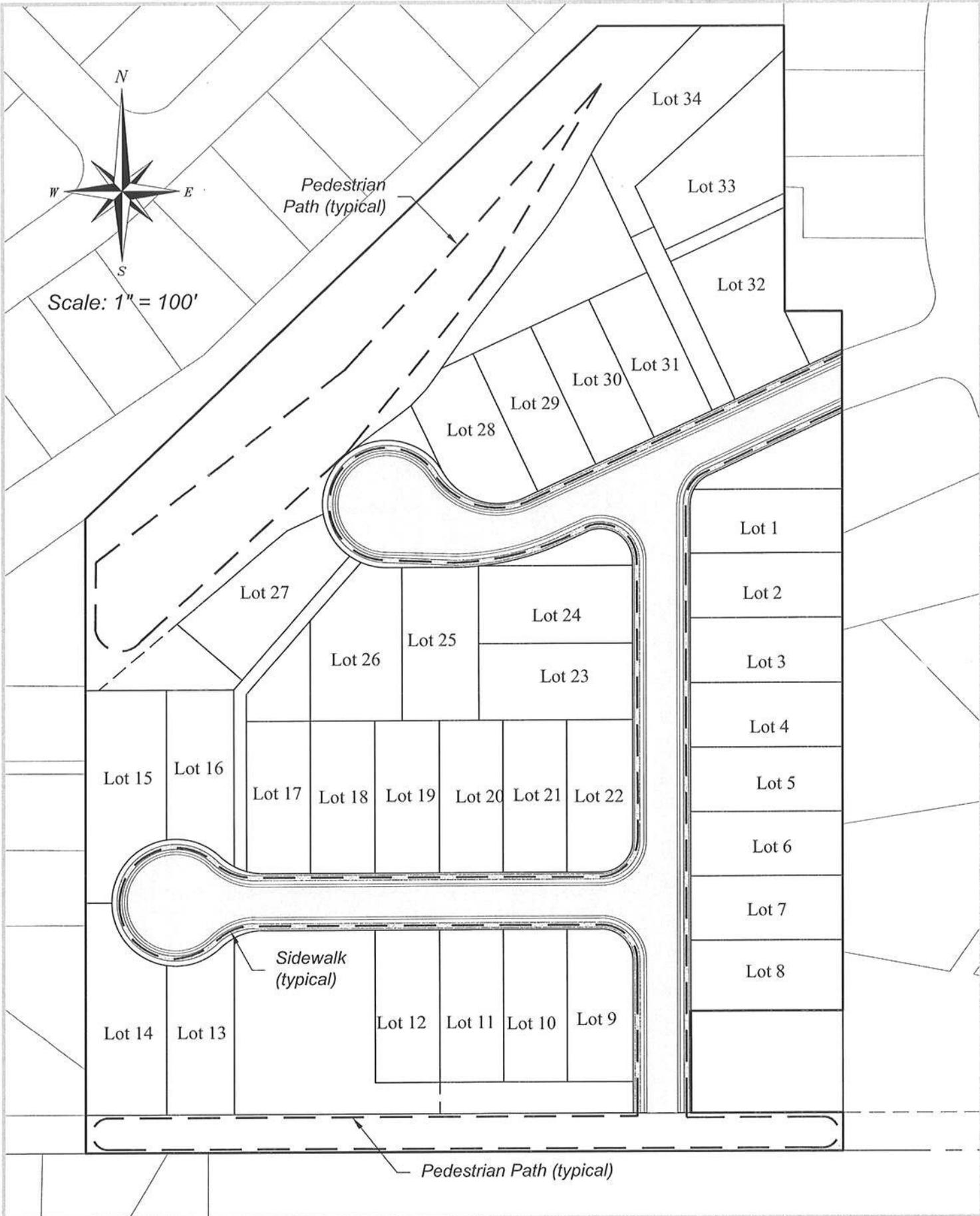
Plant Preservation Plan is prepared, at the time of the Tentative Plat. Preliminary numbers are discussed in Section II-E.

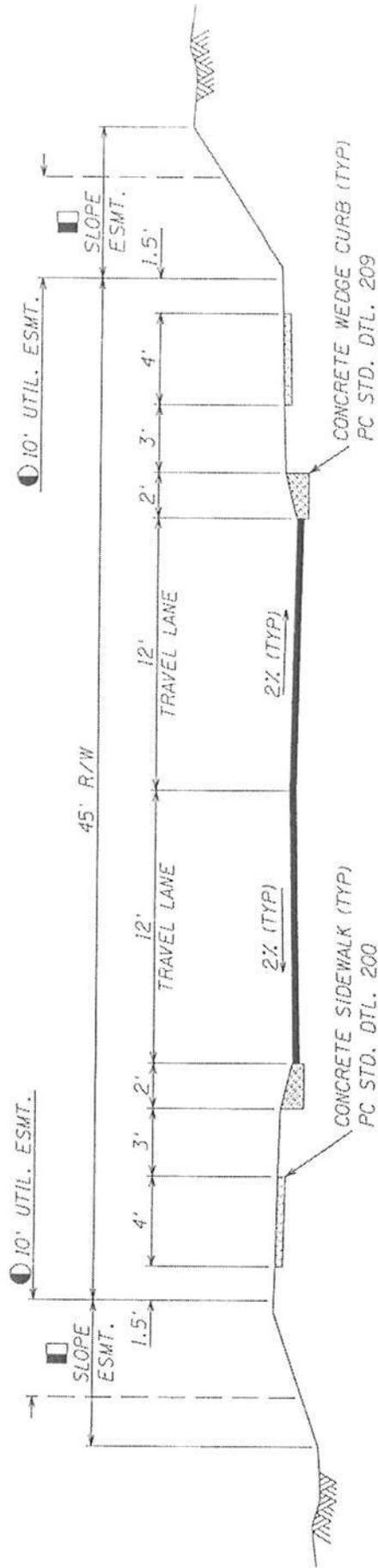
II-G. VIEWSHEDS

1. The development is not expected to block any significant views or vistas seen from the adjacent properties, either close by or remote. The dominant offsite views are of the Tortolita Mountains, to the northwest, which are not expected to be obscured at all.
2. No mitigation measures should be necessary given the conclusions expressed above.

II-H. TRANSPORTATION

1. The PDP shows one ingress/egress point at the existing Briar Rose Lane. This number of one ingress/egress point into this proposed subdivision, with 34 lots, is sufficient and meets the Pima County Department of Transportation standards. The traffic in and out of this subdivision at Briar Rose Lane is the place where access has been anticipated for many years. The plat for the Las Lindas subdivision to the east created the right-of-way for Briar Rose Lane, putting the public on notice that this is the point where access to the subject property will take place. The traffic that would be generated by the planned 34 lots will be handled by the adjacent streets, particularly Crestone Drive, even if just classified as a 'local street'. However, given its extension to the east beyond the boundaries of the Las Lindas subdivision and its segment length greater than ¼ mile it could easily be classified as a 'residential collector street', in which case the design capacity would increase. The distance from the Briar Rose Lane & Crestone Drive intersection from the nearest intersection, that being at Crestone Drive & Elan Lane, is 408 feet to the south, a distance in compliance with the PDCOT standards.
2. There are no future off-site road improvements that the proposed development depends upon for access.
3. Of all the streets discussed in Section I-F.1 the only one with any current capacity issues is Thornydale Road. However, since that road is scheduled for widening in less than 5 years the future capacity of that road can be used, per the Site Analysis Report Checklist. With the use of that number (i.e. 34,000 vpd) there will be sufficient capacity in this road for the subject development.
4. Given the lack of negative impact it is considered unnecessary to propose any traffic mitigation.
5. Sidewalks will be built on both sides of all internal streets per Subdivision and Development Street Standards Detail 4.1 for 'urban residential' local streets. Additionally, there will be a pedestrian path through thru the northerly common area, and pedestrian opportunities will exist within the southerly easement area for the project residents. This is all shown conceptually on Exhibit II-H.5. There are no internal designated bike lanes within the project. There are no regional pedestrian or bike paths/lanes nearby to tie in to.
6. All internal streets will conform to the Pima County Street Standard Detail 4.1, which contains a 45 foot right-of-way. A copy of that Detail is enclosed as Exhibit II-H.6. The streets shall be public unless Pima County policy requires that they be private.
7. The existing roadway facilities adjacent to the property and from that street to the nearest arterial are sufficient, and so it is thought the project meets Transportation Concurrency. This assumes Thornydale Road to be widened within 5 years per the current projection.





- OR AS DETERMINED BY UTILITY COMPANIES
- WHERE APPLICABLE

DETAIL 4.1

LOCAL STREET
 URBAN RESIDENTIAL SUBDIVISION
 ALTERNATIVE 1
 (See Table 3.1 for Street Classification)



PIMA COUNTY
 DEPARTMENT OF
 TRANSPORTATION

8. Table 3.2 of the Street Standards indicates the number of peak hour trips per dwelling unit is 1.02. That would result in a total of 34.68 peak hour trips. That is far below the threshold for a Traffic Impact Statement, which is 100 peak hour trips.
9. A plan to reduce automobile dependence is not offered as one does not seem practical for such a parcel of land located in such a suburban condition. Some may indeed walk or bike ride to the bus stop at Thornydale Road & Linda Vista Blvd. and take the bus on Thoyndale Road, but other than a small minority the residents in this project are expected to use the automobile. The nearby residential streets have sidewalks to accommodate pedestrians but there are no sidewalks on Linda Vista Boulevard.

II-I. ON-SITE WASTEWATER TREATMENT AND DISPOSAL

1. This does not apply as sewers will be utilized.
2. This does not apply
3. This does not apply

II-J. SEWERS

1. Enclosed as Exhibit II-J.1 is the PCRWRD Capacity Response Letter. It states, in part, that “capacity is currently available for this project...”
2. The property will be served by a connection to the existing 8-inch public sewer line that terminates with a manhole in the Freer Drive easement, south of the property.
3. Onsite sewer lines are planned to be located within the public right-of-ways, under the new streets.
4. This matter is moot as all sewers are anticipated to have gravity flow.

II-K. WATER

1. The Preliminary Integrated Water Management Plan is enclosed in Appendix #5.

II-L. SCHOOLS

1. There are no schools that are either within or abut the property.
2. Enclosed as Exhibit II-L.2 is a response email from the Marana Unified School District (i.e. MUSD) to the letter I wrote which asked about capacity & related matters per the Checklist.
3. Other than to request information from MUSD there has not communication during this rezoning process.

II-M. RECREATION AND TRAILS

1. There are no official recreational areas provided within the project. Due to the depth of the Detention Basins there would not be an opportunity for recreation within their boundaries. The full in lieu option will be used as the project contains less than 65 lots. Nevertheless, the project will contain a pedestrian path, which is described in II-H.5.
2. All Common Area, including the natural area along the northwestern boundary, will be owned by the homeowners association which will be responsible for maintaining these areas per CC&Rs.
3. The Pima County Regional Trails System Master Plan shows no trails within or adjacent to the project site.



REGIONAL WASTEWATER RECLAMATION DEPARTMENT

201 NORTH STONE AVENUE
TUCSON, ARIZONA 85701-1207

JACKSON JENKINS
DIRECTOR

PH: (520) 724-6500
FAX: (520) 724-9635

February 24, 2015

Michael Marks
MJM Consulting, Inc.
7002 E. 4th Street
Tucson, Arizona 85710

Sewerage Capacity Investigation No. 2015-44 Type I

RE: PRF3 Property, Briar Rose Lane Rezoning, Parcels 22502004Q, 22502004P & 22502004V. Estimated Flow 7,344 gpd (ADWF).

Greetings:

The above referenced project is tributary to the Tres Rios Water Reclamation Facility via the Canada Del Oro Interceptor.

Capacity is currently available for this project in the public sewer G-84-24, downstream from manhole 4201-20-3.

This letter is not a reservation or commitment of treatment or conveyance capacity for this project. It is an analysis of the system as of this date and valid for one year. Allocation of capacity is made by the Type III Capacity Response.

If further information is needed, please feel free to contact us at (520) 724-6642.

Reviewed by: Kurt Stemm

Michael Marks

To: Federico, Russell
Subject: RE: PRF3 Project

From: Federico, Russell [<mailto:R.A.Federico@maranausd.org>]
Sent: Wednesday, April 08, 2015 12:52 PM
To: Michael Marks
Subject: Re: PRF3 Project

Sorry for the confusion Michael. I forgot you are in the county. In the town of Marana projects there is sometimes a impact fee that is used by the schools.
Dan can explain more if needed.

Sent from my iPhone
Russell Federico

Executive Director of Operational Support
Marana Unified School District
11279 W. Grier Rd. Suite 101
Marana, AZ 85653
520-682-4707
Fax 520-682-2514
r.a.federico@maranausd.org

On Apr 8, 2015, at 12:22 PM, Michael Marks <mjmconsulting@cox.net> wrote:

Russ,

Thanks. If I may, I'd like to ask what fees you might be talking about. Can you explain? Thanks.

Mike

From: Federico, Russell [<mailto:R.A.Federico@maranausd.org>]
Sent: Wednesday, April 08, 2015 11:27 AM
To: Michael Marks
Subject: Re: PRF3 Project

Michael,

→ I have reviewed the proposed project. The schools that will serve the proposal are Ironwood Elementary, Tortolita Middle School and Mountain View High School. All three schools are equipped and have the capacity to meet the needs of your proposed project.

Any district related fees can be sent to our CFO Dan Contorno.

Thanks,

Russ Federico
Executive Director Operational Support
Marana Unified School District
520-682-4707
Inspiring students to learn today and lead tomorrow!
Sent from my iPad

II-N CULTURAL RESOURCES: ARCHAEOLOGICAL AND HISTORIC SITES

1. The PAST cultural resources survey report (see Section I-I for official title) has identified that no archaeological or historical resources are known to exist on the site.
2. In the event that cultural resources are revealed during ground-disturbing activities, all construction shall cease, and consultation shall be initiated with Arizona State Museum (ASM) to assess the potential significance of any unearthened materials (ARS §41-841). If human skeletal remains or funerary objects are discovered, ASM will be contacted immediately (ARS §41-865 & §41-844), at (520) 621-4795, so that cultural groups who claim cultural or religious affinity to them can make appropriate arrangements for the repatriation and reburial of the remains. The human remains will be removed from the site by a professional archaeologist pending consultation and review by the Arizona State Museum and the concerned cultural groups.

II-O. ENVIRONMENTAL QUALITY

1. Grading shall take place in accordance with the Pima County Grading Ordinance and the Pima County Air Quality Control permit process. The site, in terms of the construction and paving of the internal streets and the installation of utilities and the construction of the building pads & driveways, will be done according to approved construction plans and in accordance with the requirements of the Pima County Department of Environmental Quality.
2. No meeting was held as one was not necessary because:
 - a. The proposed use is not be classified per to the Air Quality Code 17.12.140 as either Class I or Class II or Class III.
 - b. The proposed zoning is CR-4.

II-P. AGREEMENTS

1. There were discussions with the nearby neighborhoods during the Comprehensive Plan Amendment process, but none since the rezoning process has started. There will be a new meeting once the Site Analysis Report is approved.

APPENDIX

1. Material on Adjacent Subdivisions

PRF3 LLC - BRIAR ROSE LANE PROJECT
The Status of Subdivision Plats Surrounding the Property

1. **Las Linda (46/72)**
 - It is located immediately to the east.
 - It contains 76 lots and a gross 25.67 acres.
 - The density is 2.96 residences per acre (RAC)

2. **Overton Heights III (43/72)**
 - It is located to the east.
 - It contains 88 lots and a gross 28.9 acres.
 - The density is 3.04 residences per acre (RAC)

3. **Overton Heights (41/13)**
 - It is located further to the south.
 - It contains 19 lots and a gross 4.67 acres.
 - The density is 4.07 residences per acre (RAC)

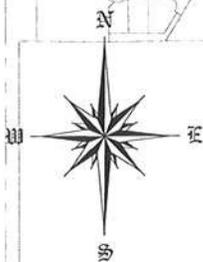
4. **Overton Heights I (41/92)**
 - It is located to the south.
 - It contains 31 lots and a gross 10.02 acres.
 - The density is 3.09 residences per acre (RAC)

5. **Kachina Meadows (38/15)**
 - It is located to the southwest.
 - It contains 82 lots and a gross 19.5 acres.
 - The density is 4.21 residences per acre (RAC)

6. **Park Lane (41/49)**
 - It is located to the west.
 - It contains 64 lots and a gross 9.5 acres.
 - The density is 6.74 residences per acre (RAC)

7. **Linda Vista Ridge (46/72)**
 - It is located immediately to the west.
 - It contains 77 lots and a gross 24.3 acres.
 - The density is 3.17 residences per acre (RAC)

8. **The Composite of all 7 Subdivisions**
 - There are a total of 437 lots on a total of 122.56 acres
 - The density of these total number of lots on the total number of acres is 3.57 RAC
 - The average density of the seven subdivisions is 3.9 RAC



Scale: 1" = 500'

Sumter Drive

Linda Vista Blvd.

Arthur Pack Park

Thornydale Road

Linda Vista Ridge
Book 46MP, page 72

1/4 mile

Las Lindas
Book 46MP, page 76

Ironwood Elementary School

Freer Drive

Park Lane
Book 41MP, page 49

Kachina Meadows
Book 38MP, page 15

Overton Heights I
Book 41MP, page 92

Overton Heights III
Book 43MP, page 72

Park Lane
Book 47MP, page 12

Overton Heights
Book 41MP, page 13

Overton Road

APPENDIX

2. WestLand Resources Special Status Species Memorandum

**FREER DRIVE PROPERTY
SPECIAL-STATUS SPECIES MEMORANDUM**

Prepared for: PRF3 LLC
Prepared by: WestLand Resources, Inc.
Date: February 3, 2015
Project No.: 1279.03

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FIGURES

Figure 1.	Vicinity Map
Figure 2.	Aerial of Property Vicinity

ATTACHMENTS

Attachment 1.	Arizona Environmental Online Review Tool Report
Attachment 2.	Sabra Tonn, AGFD, Personal Communication (Email)
Attachment 3.	Scott Richardson, USFWS, Personal Communication (Email)

1. INTRODUCTION

PRF3 LLC (PRF3) is seeking to rezone 9.38 acres of undeveloped land located on Freer Drive, approximately 0.25 miles east of Thornydale Road in unincorporated Pima County, Arizona (the Property; *Figure 1*). Pima County guidelines, Part I.D.6, require that the site analysis include Arizona Game and Fish Department (AGFD) Heritage Data Management System (HDMS) information on documented occurrences of special-status species from within the vicinity of the subject property (Pima County Development Services Department 2010). In support of the Site Analysis Report for the rezoning effort, PRF3 retained WestLand Resources, Inc. (WestLand) to evaluate the likelihood for occurrence on the Property of species that have been documented within the vicinity of the Property, as recorded in the AGFD HDMS. For purposes of this document, special-status species include species listed in the HDMS as occurring within 3 miles of the Property.

Section 2 of this document provides a brief site description, *Section 3* describes the methods used to determine which species to address in the document and how the evaluation of potential to occur on the Property was conducted, and *Section 4* presents the results of the evaluation of the potential to occur on the Property for each of the species, including a summary table.

2. SITE DESCRIPTION

The Property is located on the alluvial fan of the Tortolita Mountains, approximately midway between the mountains and the Santa Cruz River. High-density residential development surrounds the Property on all sides, and the area within a mile radius of the Property is a patchwork of high- to low-density residential and commercial development, community facilities, and tracts of undeveloped lands (*Figure 2*).

Vegetation on the Property and in the region in general is a relatively dense and diverse association of leguminous trees and mixed cacti and shrubs.

Foothill paloverde (*Parkinsonia microphylla*) and desert ironwood (*Olneya tesota*) are dominant trees on the Property. Whitethorn acacia (*Vachellia constricta*) is common and blue paloverde (*Parkinsonia florida*) and velvet mesquite (*Prosopis velutina*) are present in smaller numbers.

Shrubs are generally not at particularly high density on the Property. Creosotebush (*Larrea tridentata*) is common, but more concentrated on the southern half of the Property. Other shrubs include desert hackberry (*Celtis pallida*), greythorn (*Ziziphus obtusifolia*), limberbush (*Jatropha cardiophylla*), and along a wash on the northwest side of the Property that is designated as Important Riparian Area by Pima County, desert broom (*Baccharis sarothroides*) and desert

ragweed (*Ambrosia ambrosioides*). Triangle-leaf bursage (*Ambrosia deltoidea*) is the dominant sub-shrub.

Numerous species of cacti are present on the Property, including saguaro (*Carnegiea gigantea*), buckhorn cholla (*Cylindropuntia acanthocarpa*), Christmas cholla (*C. leptocaulis*) chainfruit cholla (*C. fulgida*), prickly pear (*Opuntia engelmannii*), barrel cactus (*Ferocactus wislizenii*), pincushion cactus (*Mammillaria grahamii*), and hedgehog cactus (*Echinocereus fendleri*). Buckhorn cholla is especially abundant in the middle portion of the Property. Saguaros are also abundant, with a large majority of individuals less than 8 feet in height.

3. METHODS

WestLand used the AGFD Online Environmental Review Tool to query the HDMS for species occurrences within the vicinity of the Property. This provided the list of species evaluated for potential occurrence on the Property. The resulting Arizona Environmental Online Review Tool Report (*Attachment 1*) lists the known occurrence of five special-status species within 3 miles of the Property: the Tumamoc globeberry (*Tumamoca macdougalii*), fulvous whistling-duck (*Dendrocygna bicolor*), cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*), Sonoran desert tortoise (*Gopherus morafkai*), and lesser long-nosed bat (*Leptonycteris curasoae yerbabuenae*).

WestLand used information obtained from the Arizona Environmental Online Review Tool Report, personal communications with Sabra Tonn from AGFD (*Attachment 2*) and Scott Richardson from the US Fish and Wildlife Service (USFWS; *Attachment 3*), and descriptions of the special-status species' habitats in relation to habitat at the Property to evaluate the potential for the species to occur on the Property.

4. SPECIAL-STATUS SPECIES EVALUATION RESULTS

The results of the evaluations for the potential occurrence of the five special-status species at the Property are discussed below and summarized in *Table 1*. The only species with Endangered Species Act (ESA) protection is the lesser long-nosed bat, listed as endangered. The Sonoran desert tortoise is a candidate for ESA protection; the fulvous whistling-duck and the cactus ferruginous pygmy-owl have no ESA status, but are considered species of concern by the USFWS; and the Tumamoc globeberry does not have an ESA or USFWS status, but under the Arizona Native Plant Law, it holds a status of Salvage Restricted, requiring a permit for collection (AGFD 2014).

4.1. TUMAMOC GLOBEBERRY

It is possible for the Tumamoc globeberry to occur within the Property. The species is found in Pima County along gullies and sandy washes of hills and valleys in the Sonoran desertscrub, including in sandy soils (AGFD 2004), which are present within the Property. Several locations of Tumamoc globeberry have been documented in the vicinity of the Property, including near Arthur Pack Regional Park (Sabra Tonn, AGFD, pers. comm., January 23, 2015). The above-ground portion of the plant arises as early as April, but often much or much later, depending on precipitation; flowers following summer rains; and dies with the first frost, usually by November, after which only an underground tuber remains (AGFD 2004). The species can remain below ground for years and turn up again in vacant lots around the Tucson area (Sabra Tonn, AGFD, pers. comm., January 23, 2015).

4.2. SONORAN DESERT TORTOISE

The Sonoran desert tortoise has the possibility to occur within the Property as a transient. Habitat for the Sonoran desert tortoise is marginal within the Property, which lacks its typical habitat of rocky slopes and incised caliche washes. The nearest rocky slopes are approximately 5 miles to the north in the Tortolita Mountains. However, there are records of the Sonoran desert tortoise occurring within 3 miles of the Property (AGFD 2014), and along a 6-mile stretch Tangerine Road, which is approximately 3 miles north of the Property at its nearest location, six tortoises were found dead during a road kill study (Lowery et al. 2011). The Property is separated from typical habitat for the species by busy roadways other than Tangerine Road, and habitat in the Property vicinity is fragmented. Despite these obstacles, there is the potential for the species to pass through the Property. With the Property in an urban setting, it would be difficult to determine if any found on the Property were naturally occurring individuals or escaped pets (Sabra Tonn, pers. comm., January 23, 2015).

4.3. FULVOUS WHISTLING-DUCK

The fulvous whistling-duck has no potential to occur within the Property. The species was recorded near recharge ponds along the Santa Cruz River approximately 3 miles southwest of the Property in 1995 (Sabra Tonn, pers. comm., January 23, 2015). The species requires freshwater wetlands or other open waters and adjacent fields, which are absent on the Property.

4.4. CACTUS FERRUGINOUS PYGMY-OWL

The cactus ferruginous pygmy-owl is unlikely to occur within the Property. The Property includes paloverde (*Parkinsonia* spp.), desert ironwood (*Olneya tesota*) and saguaro (*Carnegiea gigantea*) as dominant vegetation species, as well as xeroriparian area, all of which are included

among the variety of vegetation species and communities that the species is associated with (USFWS 2011). Cactus ferruginous pygmy-owl territories have been recorded in northwest Tucson in all directions from the Property, the nearest approximately 0.5 mile to the east. However, it is currently unknown if any individuals remain in the area (Sabra Tonn, pers. comm., January 23, 2015). Reportedly, only one male was known in northwest Tucson in 2006 (Center for Biological Diversity and Defenders of Wildlife 2007), but survey effort has fallen dramatically since the species was removed from the endangered species list in 2006 (USFWS 2011). On April 27, 2005, Scott Richardson, the USFWS lead for the cactus ferruginous pygmy-owl, granted an exemption from the need to survey the Property for the species. Mr. Richardson wrote that based upon the “fragmented and isolated nature of this parcel... the extent and intensity of the surrounding land uses make it extremely unlikely that a pygmy-owl occupies or would occupy this parcel.”

4.5. LESSER LONG-NOSED BAT

The lesser long-nosed bat has potential to forage within the Property, which is within the late spring to fall range of the species. The species forages on the nectar and fruit of columnar cacti (e.g., saguaros), which are present on the Property, and individuals have been documented foraging at locations less than 2 miles from the Property (Lowery et al. 2009).

Table 1. Potential for special-status species with occurrence records within 3 miles of the Freer Drive property to occur on the Freer Drive property.

Species and Federal Status	Known Geographic Range and Habitat Preference(s)	Potential to occur at Property
P L A N T S		
Tumamoc globeberry <i>(Tumamoca macdougalii)</i> Status: <u>Federal:</u> None <u>Critical Habitat:</u> No <u>Recovery Plan:</u> No	Range: Extreme southern Pinal and Maricopa counties, widespread in Pima County. Habitat: Found along gullies and sandy washes of hills and valleys in the Sonoran desertscrub and Sinaloan thornscrub communities; sandy soils of valley bottoms to rocky soils of upper bajada slopes. Elevation: Below 3,000 ft Reference: AGFD 2004	Potential to occur: Possible. Potentially suitable substrates and nurse plants for Tumamoc globeberry are found within the Property.

Species and Federal Status	Known Geographic Range and Habitat Preference(s)	Potential to occur at Property
R E P T I L E S		
<p>Sonoran desert tortoise <i>(Gopherus morafkai)</i> Status: <u>Federal:</u> Candidate (USFWS 2010) <u>Critical Habitat:</u> No <u>Recovery Plan:</u> No</p>	<p>Range: Occurs throughout Arizona's Sonoran desert with appropriate habitat. Eastern edge of range extends to the middle and lower San Pedro River watershed. Habitat: Found primarily on rocky slopes and bajadas of Mojave and Sonoran desertscrub; also found associated with caliche caves along lower Sonoran desert washes. Elevation: 510–5,300 ft Reference(s): AGFD 2010</p>	<p>Potential to occur: Possible transient occurrence. Habitat for the Sonoran desert tortoise is marginal within the Property. Rocky slopes and incised caliche washes absent; nearest such habitat is approximately 5 miles north in the Tortolita Mountains. Records of tortoises within 3 miles of the Property may be tortoises wandering from there. Released or escaped pet tortoises could also be in the vicinity.</p>
B I R D S		
<p>Fulvous whistling-duck <i>(Dendrocygna bicolor)</i> Status: <u>Federal:</u> None <u>Critical Habitat:</u> No <u>Recovery Plan:</u> No</p>	<p>Range: In Arizona, the fulvous whistling-duck occurs eastward to Phoenix and Picacho Lake, but most commonly observed along Colorado River south of Cibola. Habitat: Found primarily in freshwater wetlands and in fields adjacent to freshwater wetlands. Elevation: 2,150 ft Reference(s): AGFD 2001a</p>	<p>Potential to occur: None. There are no wetlands or other open waters located on or adjacent to the Property.</p>
<p>Cactus ferruginous pygmy-owl <i>(Glaucidium brasilianum cactorum)</i> Status: <u>Federal:</u> Delisted <u>Critical Habitat:</u> No <u>Recovery Plan:</u> No</p>	<p>Range: Formerly fairly common in mesquite bosques throughout central southern Arizona. Have been found south of Tortolita Mountains; west of Tortilla, Rincon, Pajarito, Puerto Blanco, Ajo , Santa Catalina, and Santa Rita Mountains; Tucson area; Gila River near Bonita Creek and San Francisco River; San Pedro River near Dudleyville; and Sonoita Creek. The only recent records are from Organ Pipe Cactus National Monument, near Ajo, and suburban Tucson. Habitat: Areas of desert woodlands with tall canopy cover. Primarily found in Sonoran desertscrub and occasionally in riparian drainages and woodlands within semidesert grassland communities. Prefers to nest in cavities in saguaro cacti, but has been found in low-density suburban developments that include natural open spaces. Elevation: < 4,000 ft Reference(s): AGFD 2001b</p>	<p>Potential to occur: Possible, unlikely. The “fragmented and isolated nature of this parcel... the extent and intensity of the surrounding land uses make it extremely unlikely that a pygmy-owl occupies or would occupy this parcel.” (Scott Richardson, USFWS, pers. comm., 2005).</p>

Species and Federal Status	Known Geographic Range and Habitat Preference(s)	Potential to occur at Property
M A M M A L S		
<p>Lesser long-nosed bat (<i>Leptonycteris curasoae yerbabuena</i>)</p> <p>Status: <u>Federal:</u> Endangered (USFWS 1988) <u>Critical Habitat:</u> No <u>Recovery Plan:</u> Yes (USFWS 1995)</p>	<p>Range: A migrant species that winters in Central America, LLNBs are found in the US only in southern Arizona and extreme southwestern New Mexico from spring to fall (April to October).</p> <p>Habitat: Sonoran desertscrub through semi-desert grasslands and into oak woodlands where columnar cacti and paniculate agaves occur. Known from only three maternity roosts in Arizona. Roosts in caves, abandoned mines and occasionally old buildings. Forages at night on nectar and pollen of columnar cacti and agaves as well as fruit of columnar cacti.</p> <p>Elevation: 1,200–7,300 ft (most often < 5,500 ft)</p> <p>Reference(s): AGFD 2011</p>	<p>Potential to occur: Possible occurrence for foraging. Property is within late spring to fall range of species. Potential forage possible due to columnar cacti (i.e., saguaros).</p>

5. REFERENCES

- Arizona Game and Fish Department. 2001a. Fulvous whistling-duck (*Dendrocygna bicolor*). Unpublished abstract compiled and edited by the Heritage Data Management System, Arizona Game and Fish Department, Phoenix, Arizona. 4 pp.
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- Center for Biological Diversity and Defenders of Wildlife. 2007. Petition to List the Cactus Ferruginous Pygmy-Owl as a Threatened or Endangered Species under the Endangered Species Act. Petition to the U.S. Department of the Interior and U.S. Fish and Wildlife Service.
- Lowery, S. F., S.T. Blackman, and D. Abbate. 2009. Urban Movement patterns of Lesser Long-nosed bats (*Leptonycteris curasoae*): Management Implications for the Habitat Conservation Plan within the City of Tucson and the Town of Marana. Research Branch, Arizona Game and Fish Department, Phoenix, Arizona.
- Lowery, S. F., S. T. Blackman, and D. D. Grandmaison. 2011. Tangerine Road and La Cholla Boulevard mortality hotspot evaluation. Prepared for Town of Oro Valley Public Works Operations Division and Town of Marana Environmental Engineering Division, Pima County, Arizona. Arizona Game and Fish Department. January 2011 Draft.
- Pima County Development Services Department. 2010. Pima County Rezoning Application and Site Analysis Requirements. Pima County, Arizona.
- U.S. Fish and Wildlife Service. 1988. Endangered and Threatened Wildlife and Plants; Determination of Endangered Status for Two Long Nosed Bats. Federal Register 53(190): 38456-38460.

- _____. 1995. Lesser Long-nosed Bat Recovery Plan. U.S. Fish and Wildlife Service, Albuquerque, New Mexico. 45 pp.
- _____. 2010. Endangered and Threatened Wildlife and Plants; 12-Month Finding on a Petition to List the Sonoran Population of the Desert Tortoise as Endangered or Threatened; Proposed Rule. Federal Register 75 (239): 78094-78146.
- _____. 2011. Endangered and Threatened Wildlife and Plants; 12-Month Finding on a Petition To List the Cactus Ferruginous Pygmy-Owl as Threatened or Endangered With Critical Habitat; Proposed Rule. Federal Register 76 (193): 61856-61894.

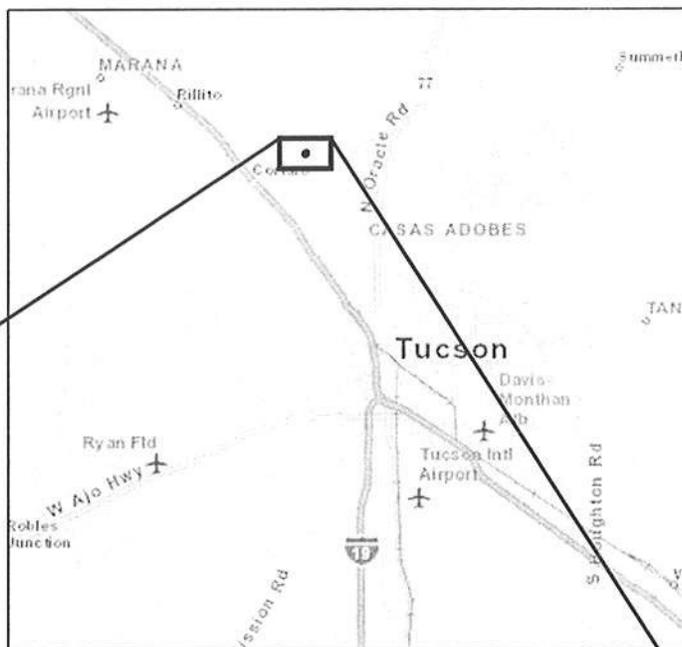
FIGURES

ARIZONA

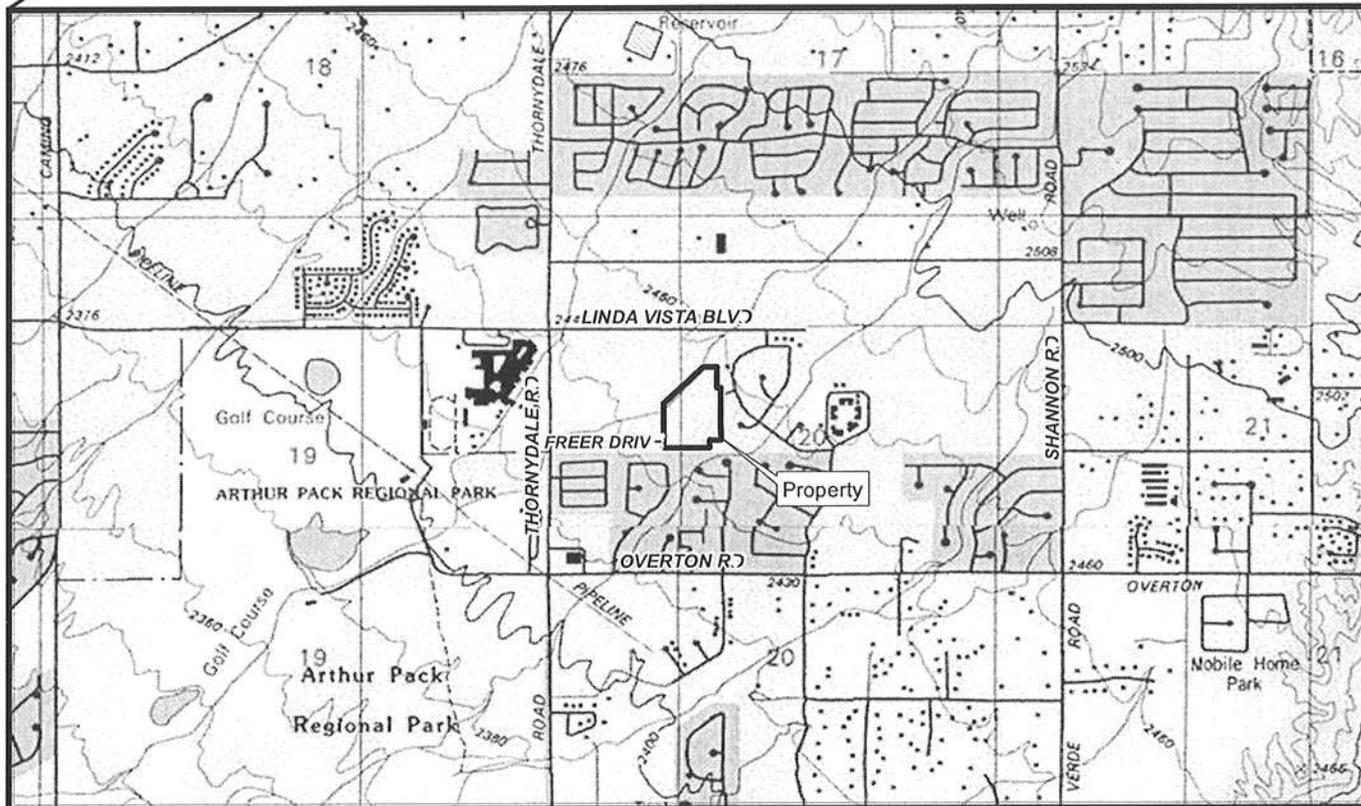


PROJECT LOCATION

TUCSON METROPOLITAN AREA



Approximate Scale 1 Inch = 10 Miles

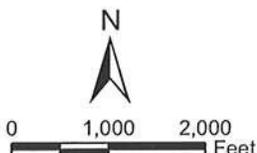


T12S, R13E, Portion of Section 20,
Pima County, Arizona,
Ruelas Canyon USGS 7.5' Quadrangle
Photo Source: ESRI Online, USA Topo & World Street Map

PRF 3 LLC
Freer Drive

VICINITY MAP
Figure 1

WestLand Resources, Inc.
Tucson • Phoenix • Flagstaff
401 E. Pinalon Falls Drive
Tucson, Arizona 85712 (520) 206-9585



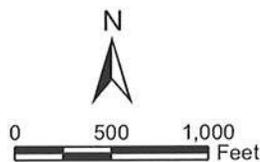


T12S, R13E, Portion of Section 20,
 Pima County, Arizona,
 Image Source: Pima County, 2012

Legend
 Project Area

PRF 3 LLC
 Freer Drive
 REGIONAL OVERVIEW
 Figure 2

WestLand Resources, Inc.
 Tucson • Phoenix • Flagstaff
 4051 E. Paradise Falls Drive
 Tucson, Arizona 85712 (520) 296-9988



ATTACHMENT A

**ARIZONA
ENVIRONMENTAL
ONLINE REVIEW
TOOL REPORT**

Arizona Environmental Online Review Tool Report



Arizona Game and Fish Department Mission

To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:

Freer Drive

Project Description:

Single-family homes

Project Type:

Development Outside Municipalities (Rural Development), Residential subdivision and associated infrastructure, New construction

Contact Person:

Scott Hart

Organization:

WestLand Resources, Inc.

On Behalf Of:

PRIVATE

Project ID:

HGIS-00198

Please review the entire report for project type and/or species recommendations for the location information entered. Please retain a copy for future reference.

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HabiMap Arizona data, specifically Species of Greatest Conservation Need (SGCN) under our State Wildlife Action Plan (SWAP) and Species of Economic and Recreational Importance (SERI), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:

Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:

**Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366**

Or

PEP@azgfd.gov

6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies

Freer Drive

Aerial Image Basemap With Locator Map



- Project Boundary
- Buffered Project Boundary

Project Size (acres): 7.96

Lat/Long (DD): 32.3783 / -111.0419

County(s): Pima

AGFD Region(s): Tucson

Township/Range(s): T12S, R13E

USGS Quad(s): RUELAS CANYON

Service Layer Credits: Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong).



Freer Drive

Web Map As Submitted By User



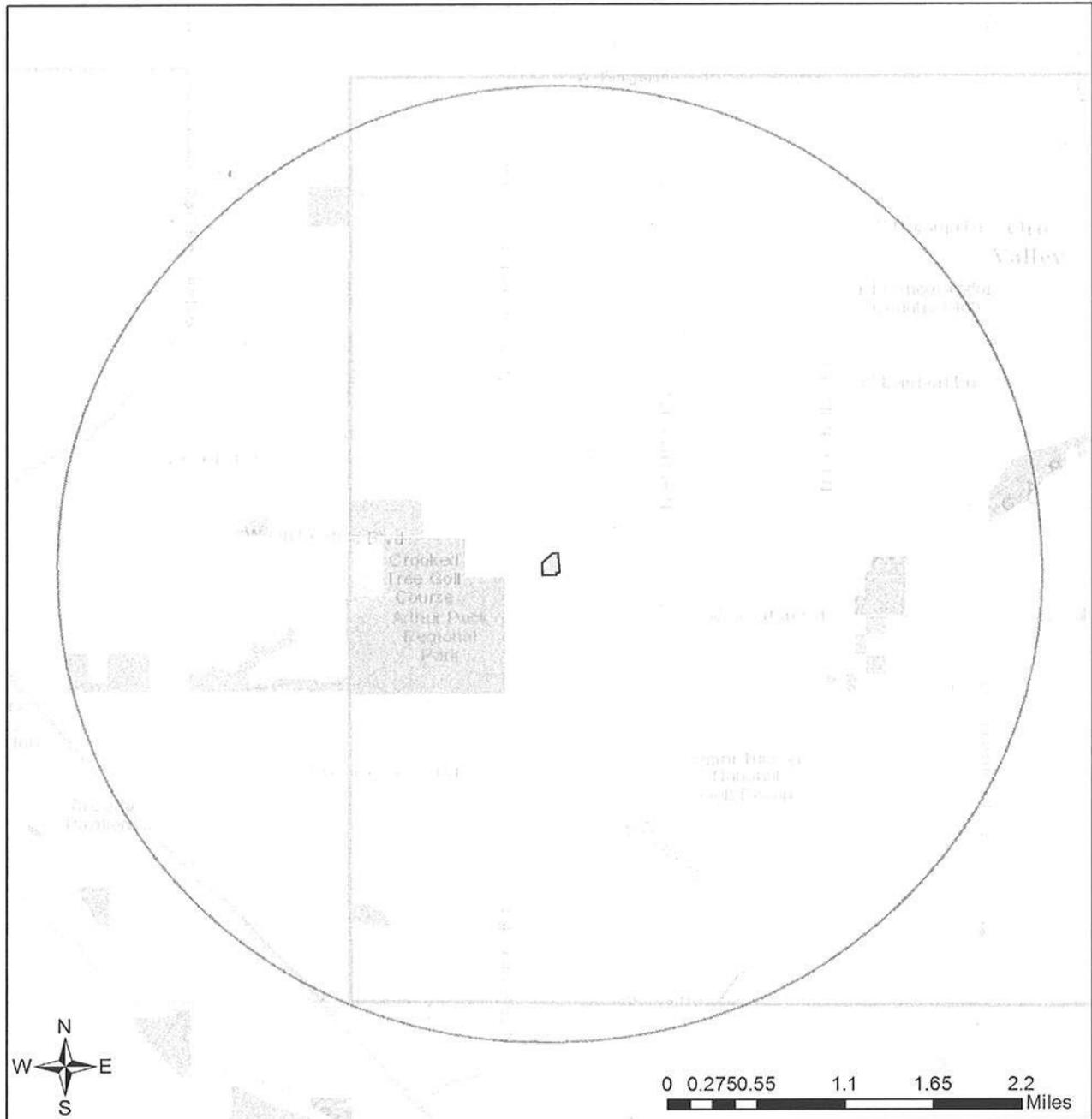
- Project Boundary
- Buffered Project Boundary

Project Size (acres): 7.96
Lat/Long (DD): 32.3783 / -111.0419
County(s): Pima
AGFD Region(s): Tucson
Township/Range(s): T12S, R13E
USGS Quad(s): RUELAS CANYON

Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community
Arizona Game and Fish Department - GIS Program
Arizona Game and Fish Department

Freer Drive

Topo Basemap With Township/Ranges and Land Ownership



- Project Boundary
- Buffered Project Boundary
- Township/Ranges
- AZ Game and Fish Dept.
- BLM
- BOR
- Indian Res.
- Military

- Mixed/Other
- National Park/Mon.
- Private
- State and Regional Parks
- State Trust
- US Forest Service
- Wildlife Area/Refuge

Project Size (acres): 7.96
 Lat/Long (DD): 32.3783 / -111.0419
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T12S, R13E
 USGS Quad(s): RUELAS CANYON

Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Special Status Species and Special Areas Documented within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	State	SGCN
Dendrocygna bicolor	Fulvous Whistling-Duck	SC				
Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy-owl	SC	S	S	WSC	1B
Gopherus morafkai	Sonoran Desert Tortoise	C*	S		WSC	1A
Leptonycteris curasoae yerbabuena	Lesser Long-nosed Bat	LE			WSC	1A
Tumamoca macdougallii	Tumamoc Globeberry		S	S	SR	

Note: Status code definitions can be found at http://www.azgfd.gov/w_c/edits/hdms_status_definitions.shtml.

**Species of Greatest Conservation Need
 Predicted within Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	State	SGCN
Aix sponsa	Wood Duck					1B
Ammospermophilus harrisi	Harris' Antelope Squirrel					1B
Anaxyrus retiformis	Sonoran Green Toad			S		1B
Anthus spragueii	Sprague's Pipit	C*			WSC	1A
Antrostomus ridgwayi	Buff-collared Nightjar		S			1B
Aquila chrysaetos	Golden Eagle	BGA		S		1B
Aspidoscelis stictogramma	Giant Spotted Whiptail	SC	S			1B
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		1B
Botaurus lentiginosus	American Bittern				WSC	1B
Buteo regalis	Ferruginous Hawk	SC		S	WSC	1B
Chilomeniscus stramineus	Variable Sandsnake					1B
Colaptes chrysoides	Gilded Flicker			S		1B
Coluber bilineatus	Sonoran Whipsnake					1B
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1B
Crotalus tigris	Tiger Rattlesnake					1B
Cynanthus latirostris	Broad-billed Hummingbird		S			1B
Cyprinodon macularius	Desert Pupfish	LE			WSC	1A
Dipodomys spectabilis	Banner-tailed Kangaroo Rat			S		1B
Euderma maculatum	Spotted Bat	SC	S	S	WSC	1B
Eumops perotis californicus	Greater Western Bonneted Bat	SC		S		1B
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S	WSC	1A
Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy-owl	SC	S	S	WSC	1B
Gopherus morafkai	Sonoran Desert Tortoise	C*	S		WSC	1A
Haliaeetus leucocephalus	Bald Eagle	SC, BGA	S	S	WSC	1A
Heloderma suspectum	Gila Monster					1A
Incilius alvarius	Sonoran Desert Toad					1B
Kinosternon sonoriense sonoriense	Desert Mud Turtle			S		1B

**Species of Greatest Conservation Need
 Predicted within Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	State	SGCN
Lasiurus blossevillii	Western Red Bat		S		WSC	1B
Lasiurus xanthinus	Western Yellow Bat		S		WSC	1B
Leopardus pardalis	Ocelot	LE			WSC	1A
Leptonycteris curasoae yerbabuenae	Lesser Long-nosed Bat	LE			WSC	1A
Lepus alleni	Antelope Jackrabbit					1B
Lithobates yavapaiensis	Lowland Leopard Frog	SC	S	S	WSC	1A
Macrotus californicus	California Leaf-nosed Bat	SC		S	WSC	1B
Melanerpes uropygialis	Gila Woodpecker					1B
Meleagris gallopavo mexicana	Gould's Turkey		S			1B
Melospiza lincolni	Lincoln's Sparrow					1B
Melospiza aberti	Abert's Towhee		S			1B
Micruroides euryxanthus	Sonoran Coralsnake					1B
Myotis occultus	Arizona Myotis	SC		S		1B
Myotis velifer	Cave Myotis	SC		S		1B
Myotis yumanensis	Yuma Myotis	SC				1B
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					1B
Panthera onca	Jaguar	LE			WSC	1A
Passerculus sandwichensis	Savannah Sparrow					1B
Peucaea botterii arizonae	Arizona Botteri's Sparrow			S		1B
Peucaea carpalis	Rufous-winged Sparrow					1B
Phrynosoma solare	Regal Horned Lizard					1B
Phyllorhynchus browni	Saddled Leaf-nosed Snake					1B
Poeciliopsis occidentalis occidentalis	Gila Topminnow	LE			WSC	1A
Progne subis hesperia	Desert Purple Martin			S		1B
Setophaga petechia	Yellow Warbler					1B
Tadarida brasiliensis	Brazilian Free-tailed Bat					1B
Troglodytes pacificus	Pacific Wren					1B
Vireo bellii arizonae	Arizona Bell's Vireo					1B
Vulpes macrotis	Kit Fox					1B

Species of Economic and Recreation Importance Predicted within Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	State	SGCN
Callipepla gambelii	Gambel's Quail					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					

Project Type: Development Outside Municipalities (Rural Development), Residential subdivision and associated infrastructure, New construction

Project Type Recommendations:

Fence recommendations will be dependant upon the goals of the fence project and the wildlife species expected to be impacted by the project. General guidelines for ensuring wildlife-friendly fences include: barbless wire on the top and bottom with the maximum fence height 42", minimum height for bottom 16". Modifications to this design may be considered for fencing anticipated to be routinely encountered by elk, bighorn sheep or pronghorn (e.g., Pronghorn fencing would require 18" minimum height on the bottom). Please refer to the Department's Fencing Guidelines located on the home page of this application at <http://www.azgfd.gov/hgis/guidelines.aspx>.

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife.

Consider impacts of outdoor lighting on wildlife and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use. Use only the minimum amount of light needed for safety. Narrow spectrum bulbs should be used as often as possible to lower the range of species affected by lighting. All lighting should be shielded, cantered, or cut to ensure that light reaches only areas needing illumination.

Minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g., microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g., livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before leaving the site. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants, <https://agriculture.az.gov/>. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control, <http://www.usda.gov/wps/portal/usdahome>. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information http://www.azgfd.gov/h_f/hunting_rules.shtml

The construction or maintenance of water developments should include: incorporation of aspects of the natural environment and the visual resources, maintaining the water for a variety of species, water surface area (e.g., bats require a greater area due to in-flight drinking), accessibility, year-round availability, minimizing potential for water quality problems, frequency of flushing, shading of natural features, regular clean-up of debris, escape ramps, minimizing obstacles, and minimizing accumulation of silt and mud.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (include spawning seasons), and to reduce spread of exotic invasive species. We recommend early direct coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

Based on the project type entered, coordination with State Historic Preservation Office may be required (<http://azstateparks.com/SHPO/index.html>).

Trenches should be covered or back-filled as soon as possible. Incorporate escape ramps in ditches or fencing along the perimeter to deter small mammals and herpetofauna (snakes, lizards, tortoise) from entering ditches.

Communities can actively support the sustainability and mobility of wildlife by incorporating wildlife planning into their regional/comprehensive plans, their regional transportation plans, and their open space/conservation land system programs. An effective approach to wildlife planning begins with the identification of the wildlife resources in need of protection, an assessment of important habitat blocks and connective corridors, and the incorporation of these critical wildlife components into the community plans and programs. Community planners should identify open spaces and habitat blocks that can be maintained in their area, and the necessary connections between those blocks to be preserved or protected. Community planners should also work with State and local transportation planning entities, and planners from other communities, to foster coordination and cooperation in developing compatible development plans to ensure wildlife habitat connectivity. The Department's guidelines for incorporating wildlife considerations into community planning and developments can be found on the home page of this application at <http://www.azgfd.gov/hgis/guidelines.aspx>.

Design culverts to minimize impacts to channel geometry, or design channel geometry (low flow, overbank, floodplains) and substrates to carry expected discharge using local drainages of appropriate size as templates. Reduce/minimize barriers to allow movement of amphibians or fish (e.g., eliminate falls). Also for terrestrial wildlife, washes and stream corridors often provide important corridors for movement. Overall culvert width, height, and length should be optimized for movement of the greatest number and diversity of species expected to utilize the passage. Culvert designs should consider moisture, light, and noise, while providing clear views at both ends to maximize utilization. For many species, fencing is an important design feature that can be utilized with culverts to funnel wildlife into these areas and minimize the potential for roadway collisions. Guidelines for culvert designs to facilitate wildlife passage can be found on the home page of this application at <http://www.azgfd.gov/hgis/guidelines.aspx>.

Based on the project type entered, coordination with Arizona Department of Environmental Quality may be required (<http://www.azdeq.gov/>).

Based on the project type entered, coordination with Arizona Department of Water Resources may be required (<http://www.azwater.gov/azdwr/default.aspx>).

Based on the project type entered, coordination with U.S. Army Corps of Engineers may be required (<http://www.usace.army.mil/>)

Based on the project type entered, coordination with County Flood Control district(s) may be required.

Development plans should provide for open natural space for wildlife movement, while also minimizing the potential for wildlife-human interactions through design features. Please contact Project Evaluation Program for more information on living with urban wildlife.

Vegetation restoration projects (including treatments of invasive or exotic species) should have a completed site-evaluation plan (identifying environmental conditions necessary to re-establish native vegetation), a revegetation plan (species, density, method of establishment), a short and long-term monitoring plan, including adaptive management guidelines to address needs for replacement vegetation.

The Department requests further coordination to provide project/species specific recommendations, please contact Project Evaluation Program directly. PEP@azgfd.gov

Project Location and/or Species Recommendations:

HDMS records indicate that one or more listed, proposed, or candidate species or Critical Habitat (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at <http://www.fws.gov/southwest/es/arizona/> or:

Phoenix Main Office
2321 W. Royal Palm Rd, Suite 103
Phoenix, AZ 85021
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office
201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office
SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

HDMS records indicate that Sonoran Desert Tortoise have been documented within the vicinity of your project area. Please review the Tortoise Handling Guidelines found at: <http://www.azgfd.gov/hgis/pdfs/Tortoisehandlingguidelines.pdf>

From: [Sabra Tonn](#)
To: [Breck Jacoby](#)
Cc: [Scott Hart](#)
Subject: RE: Freer Drive Records Request
Date: Friday, January 23, 2015 11:45:36 AM

Breck,

The fulvous whistling duck is almost 3 miles to the SW along the Santa Cruz River near recharge ponds. 1995 last survey report.

Cactus ferruginous pygmy-owl used to have about 15-20 territories completely surrounding your project area with the closest being about half a mile to the east. I do not know if any CFPO are still in the area. Surveys have not been conducted in many years since it was removed from the Endangered Species List.

Tumamoc globeberry has several locations in the area including near the Arthur Pack Regional Park. It is known to go below ground for years and turn up again in vacant lots around the Tucson area. Surveys need to be conducted the right time of year (and when good precipitation has been done). There have been some recent survey results in the *Plant Press*. Frank Reichenbacher did surveys in the 1980s and he has been revisiting site in the past several years.

Sonoran desert tortoise can be found throughout the area with a recent road kill study (2010-05-09) that found 6 individuals dead on Tangerine road over a six mile stretch. The certainly move through the area, but with the project being in an urban setting it would be difficult to determine if it was a naturally occurring individual or an escaped pet on the project location.

Lesser long-nosed bat have proven to use artificial feeders in the neighborhood where this project is located. There are days roosts in Pusch Ridge and also in the Santa Catalina Mountains. 2011.

Let me know if this doesn't give you enough info.

Sabra

From: Breck Jacoby [mailto:BJacoby@westlandresources.com]
Sent: Friday, January 23, 2015 11:11 AM
To: Sabra Tonn
Cc: Scott Hart
Subject: Freer Drive Records Request

Hi Sabra,

My colleague, Scott Hart, and I submitted an online review tool project (Attached; Project ID: HGIS-00198). The reviewed report indicated that fulvous whistling-duck, cactus ferruginous pygmy-owl, Sonoran desert tortoise, lesser long-nosed bat and Tumamoc globeberry have been documented within three miles of the project vicinity.

We'd like to request the details of these records (e.g., date, and location) in the region of the area queried. I understand that the exact locations may not be available to us, but any

information you could provide as to the location in relation to the project area would be greatly appreciated.

Thanks for your help,

Breck

Breck Jacoby | Environmental Technician
WestLand Resources, Inc.
4001 E Paradise Falls Drive | Tucson, AZ 85712
Office: (520) 206-9585 | Fax: (520) 206-9518

ATTACHMENT C

**SCOTT RICHARDSON,
USFWS
PERSONAL
COMMUNICATION
(EMAIL)**

Raya Ferns

From: Raya Ferns [rayaferns@darlingltd.com]
 Sent: Friday, June 10, 2005 9:52 AM
 To: ccourt5151@msn.com
 Subject: FW: CFPO Survey Exemption

Dear Mr. Courtney-
 Please find the following message from Scott Richardson re: pygmy owl surveys.
 Raya

-----Original Message-----

From: scott_richardson@fws.gov [mailto:scott_richardson@fws.gov]
 Sent: Wednesday, April 27, 2005 9:30 AM
 To: Raya Ferns
 Subject: Re: CFPO Survey Exemption

Dear Raya:

Thank you for your inquiry regarding the need to conduct pygmy-owl surveys on the parcel described below. Based on the information you provided and our evaluation of the site, we do not recommend pygmy-owl surveys for this parcel. This determination is based on the fragmented and isolated nature of this parcel. The extent and intensity of the surrounding land uses make it extremely unlikely that a pygmy-owl occupies or would occupy this parcel.

Thank you for your consideration of endangered species on this parcel.

Sincerely,

Scott Richardson
 U.S. Fish and Wildlife Service
 Tucson Suboffice
 (520) 670-6150 x 242

"Raya Ferns"
 <rayaferns@darli
 Richardson" <scott_richardson@fws.gov>
 ngltd.com>

To: "US Fish and Wildlife-

cc:
 Subject: CFPO Survey Exemption

04/14/2005 01:59
 PM

Dear Mr. Richardson-

This is a request for exemption from Cactus Ferruginous Pygmy Owl Surveys on the parcel #225-02-004G per our conversation today. The parcel in question is 1.6 acres near the southwest corner of Thornysale Rd. and Linda Vista Bl. The parcel is in the middle of a residential development and lacks habitat potential since surrounding parcels have been developed at a very high density.
 Thanks,

APPENDIX

3. Traffic Material
 - A. Letter from MJM Consulting to PCDOT
 - B. Letter from PCDOT to MJM Consulting

June 23, 2014

Mr. Robert Young, P.E.
Transportation Systems Division Manager
Pima County Department of Transportation
201 North Stone Ave, 5th Floor
Tucson, Arizona 85701

Re: Co7-14-01 PRF3 LLC – W. Freer Drive Alignment Plan Amendment

Dear Mr. Young:

I appreciate you and Jeanette DeRenne meeting with me recently. I'd like to follow up with this letter designed to repeat what was said in that meeting and then to seek confirmation from you on that matter. There were basically two separate, but interrelated, subjects that we talked about. Those are access to the subject property and the traffic condition as they currently are and as they would be impacted by the project development.

First let me identify the property and the proposed project. The property is 9.78 acres, made up of three Assessor Parcels, those being 225-02-004P, 225-02-004Q, & 225-02-004V. The property is located within Section 20 of T12S, R13E.

The property is currently zoned SR and has a Comp Plan designation of LIU 0.3 & RT. A Plan Amendment request has been filed to change the Comp Plan designation to MIU for all but a minority portion of the property which would remain RT.

As I stated in our conversation I have already had a neighborhood meeting in connection with this Plan Amendment request. And what I said is that at that meeting the neighbors brought up several concerns, including those of Access and of Traffic.

Concerning ACCESS I showed the neighbors a Conceptual Site Plan which provided for one access point, that being Briar Rose Lane. This road is a dedicated right-of-way of 45 feet in width that abuts the subject property. Some of the neighbors asked why there isn't a second access point from Freer Drive, which lies along the south boundary of the subject property. Some of the neighbors asked why the access point at Briar Rose Lane is necessary at all if the one along Freer Drive could be used. At least one neighbor asked if there is another access, maybe to the north to Linda Vista Boulevard, so that the one to Briar Rose can be avoided. I provided a response to all of these concerns at the meeting. I'd like to pursue it further, though, with you if I can.

Here are my questions for you regarding ACCESS.

1. Is it true that the project I am proposing will only need one point of vehicular access? I have previously talked with Jeanette DeRenne of your office and she indicated that the threshold for two access points is 100 dwelling units. She added that since our project contains 36 dwelling units that one point of access would be sufficient. Can you confirm that?
2. Is it true that the Briar Rose Lane right-of-way was created for the sole purpose of providing access to the subject property? The Briar Rose Lane right-of-way was dedicated by the Las Linda subdivision plat (Bk 46 Pg 76 of M&Ps), which established the 76 lots in this neighborhood.
3. Is it true that the Freer Drive alignment, along the south boundary of the subject property, is not a possible alternative access point given the minimum width of a public street right-of-way and the constraints between the subject property and Thornydale Road? Is it correct that the minimum right-of-way for a public street is 45 feet? To the west is the Linda Vista Ridge subdivision, recorded in Bk 46 Pg 72 of M&Ps, contains a 30 foot strip of common area. This strip of land could not be widened to 45 feet as the 15 foot difference would have to come out of the 8 adjacent lots who's owners would have to unanimously consent to the conveyance, which even if they would they could not because it

Letter to Robert Young
Re: PRF3 – W. Freer Drive Alignment Plan Amendment

June 23, 2014
Page 2

would create lots in violation of zoning regulations. Then if somehow these impediments could be overcome, there would still be the Parcel 225-02-004M would have to be contended with. That parcel contains only a 30 foot easement over its south boundary, so its owner would have to volunteer to dedicate right-of-way for 45 feet over its south boundary. Given that it the owner of this property has sufficient access to Thornydale Road without the need to have a public street along its south boundary I do not see any reason why this owner would volunteer to dedicate this right-of-way. Do you agree that the Freer Road alignment cannot provide a possible alternative public street for access to the subject property?

4. Given the lack of alternatives is it not accurate to say that the property is land-locked other than for the Briar Rose Lane right-of-way?

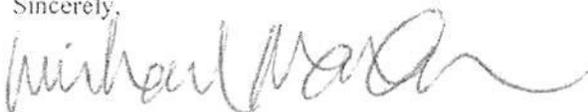
Concerning **TRAFFIC** several neighbors said the traffic on Crestone Drive is already a problem. They basically attributed this problem to 'cut-through' traffic associated with the Ironwood Elementary School. One or more claimed that the problem is so great that they have difficulty backing out of their driveway in the morning.

Here are my questions for you regarding **TRAFFIC**.

1. Putting any 'cut-through' traffic aside Crestone Drive and all other streets in the Las Linda subdivision should be able to handle all the traffic from within Las Linda as well as from the subject property without any problems. Las Linda has 76 lots and the subject property would have 36+ lots for a total of 102 lots. At 10 trips per dwelling the total traffic from within these two projects would be 1020 ADT. That would be a small percentage of the capacity of any one of these streets. But no one of these streets within Las Linda would accommodate all of this traffic, but rather the traffic would be split, if not 50/50 at least something close to it between Crestone Drive and Elan Drive.
2. The level of 'cut-through' traffic is hard to estimate and would necessitate a traffic study to get a good handle on it. Clearly, however, the amount would have to be very substantial to create such a capacity problem that the neighbors describe, when added to the onsite traffic. If the residential street capacity is somewhere in the neighborhood of 6000 ADT, and the onsite traffic is 1020 ADT, the cut-through traffic would have to represent about 5000 ADT, which is a bit difficult to imagine. I wonder if you have any thoughts on this subject.
3. Regardless of the level of 'cut-through' traffic discussed above, there may be efforts that could restrict this level of traffic. You indicated to me that signage indicating such traffic is illegal is not possible given that the street is public. I imagine it is possible that the construction of a few speed bumps on Crestone Drive might discourage people from driving through this subdivision but I understand that a high percentage of the owner of lots along Crestone Drive would have to consent to such speed bumps and this might not happen. I will explore this further, and would invite any suggestions on this subject that you might think of.

Please let me know if you have any questions. If not please provide me with a written response to these points. Thank you.

Sincerely,



Michael Marks, AICP
President



PIMA COUNTY
TRANSPORTATION

201 NORTH STONE AVENUE, FOURTH FLOOR
TUCSON, ARIZONA 85701-1207

PRISCILLA S. CORNELIO, P. E.
DIRECTOR

(520) 724-6410
FAX (520) 724-6439

June 24, 2014

Mr. Michael Marks, AICP
MJM Consulting, Inc.
7002 E. 4th Street
Tucson, AZ 85710

Re: Co7-14-01 PRF3 LLC – W. Freer Drive Alignment Plan Amendment

Dear Mr. Marks:

This is in response to your letter dated June 23, 2014 in which you ask several questions regarding access to a parcel bounded on the north and west by the Linda Vista Ridge subdivision, on the east by the Las Lindas subdivision and on the south by the Overton Heights and Kachina Meadows subdivisions. The referenced parcel is landlocked except for legal access provided by way of Briar Rose Lane, a public street platted with the Las Lindas subdivision. Briar Rose Lane was platted with the specific intent of providing access to the referenced parcel and is in fact the only access to the parcel.

There is an existing 30 foot utility and access easement that extends across the southern boundary of this parcel and continues west to Thornydale Road and east to Crestone Drive and is sometimes referred to as Freer Drive. This easement was never intended to provide access to the referenced parcel and in fact could not because it is recorded as common area in the adjacent plat to the west and as common area and parts of lots in the subdivision to the east. Also, the easement is only 30 feet wide and the minimum width for a subdivision street is 45 feet per the Subdivision and Development Street Standards.

You also raised questions about the existing traffic in the Las Lindas subdivision. The streets in Las Lindas are designed in conformance with the Subdivisions Street Standards and as such, per table 3.1 of the standards, are able to comfortably accommodate in the range of 1000 vehicles per day. Since the Las Lindas Subdivision and the referenced parcel combined would total around 100 lots the total traffic on Crestone Drive will be in the acceptable range even with some additional traffic from outside the subdivision using the streets to access the school. A traffic study would be able to quantify the amount of traffic passing through the subdivision to the school. If you and the neighbors are interested in pursuing speed humps in the subdivision to help address this pass through traffic you should contact the Neighborhood Traffic Management Program in Traffic Engineering.

Please let me know if you have any question or need further information.

Sincerely,

A handwritten signature in cursive script that reads "Robert Young". The signature is written in black ink and is positioned above the printed name.

Robert Young, P.E.
Transportation Systems Division Manager

APPENDIX

4. The Offsite Mitigation Land

PRF3 LLC - BRIAR ROSE LANE PROJECT

The Offsite Mitigation Land

The project leaves the Conservation Land System (CLS) Important Riparian Area (IRA) 'as is'. The remainder of the property is designated by the CLS as both Multiple Use Management and Special Species Management. As a result of the disturbance of that land either additional onsite open space would have to be set aside or offsite mitigation land would have to be provided. The latter option was considered to make more sense given the small size of the property. As a result an effort was made to identify a piece of property that would be both suitable and affordable. After evaluating numerous properties, one was finally found that satisfied those two principles, and more specifically Rezoning Policies B-D.

The Subject Property CLS Disturbance

The area that will be disturbed by the PRF3 project is 7.97 acres. This number of acres is based on the Preliminary Development Plan which will be subject to refinement during the subdivision platting process, but is considered sufficiently developed such that this number can be relied upon. The total site area is 9.78 acres. Subtracted from this number is 1) the IRA area which is 1.32 acres, 2) two small pieces of property abutting the IRA area which add up to 0.08 acres, and 3) the south border 30 foot easement area, an area which was previously graded by others but which the PRF3 project will not disturb, which is 0.41 acres.

The Amount of Mitigation Land

The land disturbed is designated as both Multiple Use Management (MU) and Special Species Management (SS). The MU onsite set-aside is 66 2/3 percent of the site, and the SS set-aside is 80% of the site. The alternative offsite mitigation ratios are 2:1 for Multiple Use and 4:1 for Special Species. At 2:1 the 'disturbed' 7.97 acres would require 15.94 acres of offsite mitigation land. At 4:1 the 'disturbed' are would require 31.88 acres of offsite mitigation land. I understand that when there are two or more designations overlaid on top of one another that Pima County will treat the more restrictive one as the operative one, and in this case that would be the Special Species 4:1 ratio. One additional comment is that while the property is clearly designated as Special Species the conditions for this designation do not apply to the property. The designation is based on the presence of three species, those being the Mexican spotted owl, the southwestern willow flycatcher, and the cactus ferruginous pygmy-owl. According to Westland Resources in their report submitted with the Plan Amendment the former "two species are found in montane and riparian habitats, respectively, and have no potential to use the property. The cactus ferruginous pygmy-owl was associated with the type of habitat found in the region of the property, and was known to inhabit the Tortolita Fan. However, on April 27, 2005, Scott Richardson, the US Fish and Wildlife Service lead for the cactus ferruginous pygmy-owl, which was listed endangered at the time, granted an exception from the need to survey the property for the species, based upon the "fragmented and isolated nature of this parcel... the extent and intensity of the surrounding land uses make it extremely unlikely that a pygmy-owl occupies or would occupy this parcel. This statement suggests that the SSMA designation is not warranted, because the property does not need to be managed for any of the three special species."

Co7-14-01 PRF3 LLC – W. Freer Drive Alignment Plan Amendment Rezoning Policies B-D

On October 21, 2014 the Board of Supervisors approved the Plan Amendment request for a MIU Plan Designation subject to four lettered policies. Policy A does not relate to offsite mitigation. All of the others do. The following are Policies B-D.

- B. The location of off-site mitigation properties should be within the same general geographic region of the original project site.
- C. Off-site mitigation property should provide the same or better resource values as the original project site including, but not limited to:
 1. Conservation Lands System (CLS) designations inclusive of 2004 Conservation Bond Habitat Protection Priority designations;

PRF3 LLC - BRIAR ROSE LANE PROJECT
The Offsite Mitigation Land

2. Vegetation community type(s);
 3. Habitat values for applicable CLS Special Species (i.e. breeding and dispersal);
 4. Surface water or unique landforms such as rock outcrops; and
 5. Contribution of landscape connectivity.
- D. Demonstration that the resource and conservation values of the off-site mitigation property will be protected in perpetuity.

The Proposed Offsite Mitigation Property

The property is Assessor Parcel 218-10-005V, and it contains 27.14 acres according to the Assessor's Office. It is located in the 'north-west' region of Pima County, in Section 10 of T11S, R12E. It is in the Cochie Canyon area, within the Tortolita Mountains. This property is identified in a regional context in Exhibit 1, which shows Dove Mountain to the south by about a mile. This property shall be referred to as the 'Mitigation Land' in the balance of this memo.

The Mitigation Land Ownership Context

The ownership of the land within several miles is dominated by the State of Arizona. Exhibit 2 shows the ownership, generally, of the land in the nearby area. The privately owned land, including that of the subject property, is surrounded by public land owned by Pima County and the State of Arizona. The Pima County owned lands lie to the southeast and southwest and total 292.26 acres according to the Assessors. The 80 acre parcel to the west, owned by the Primavera Foundation, is being managed as open space, according to sources we've talked to.

The Mitigation Land CLS

The Mitigation Land is classified as both Multiple Use Management and Special Species Management over 100% of the property.

The Mitigation Land Conditions

The property is vacant and in its natural state. It is covered by vegetation, described by type below.

The Mitigation Land Vegetation according to a Biological Reconnaissance Report

A report was prepared in 2008 by EPG, Inc for the Pima County Natural Resources Parks and Recreation Department on the biological conditions of about 319.4 acres. This property included the subject property plus all of the abutting/nearby Pima County owned land which was purchased subsequently to the Report date. That Report said, in part on Page 54, "The property is situated in the Arizona Upland Subdivision of the Sonoran Desert. In the canyon bottom there is a diverse Palo Verde-Cacti-Mixed Scrub biological community, which contains many ironwoods including individuals that are probably a century or more old." Elsewhere it says, on Page 8, that typically "yellow and blue paloverde, ironwood, and saguaro are the dominant tree species in the (Paloverde-Cacti-Mixed Scrub) series, and this is certainly evident on the property." The Report goes on to say, on Page 55, "The Cochie Canyon Property would be an extremely valuable acquisition for the County for several important reasons:"

The Mitigation Land and Rezoning Policies B-D

- B. The Subject Property and the Mitigation Land are both in the Tucson metropolitan 'Northwest' region.
- C. The Subject Property and the Mitigation Land are described as follows:
 1. The Mitigation Land contains the same CLS designation as does the 'disturbed' portion of the Subject Property. Both are Multiple Use Management and Special Species Management. The Subject Property is classified by the 2004 Conservation Bond Program as a Highest Priority Habitat Protection Priority Property. The Mitigation Land is not, however it is abutting lands to the southeast and to the west that are classified the same as the Subject

PRF3 LLC - BRIAR ROSE LANE PROJECT
The Offsite Mitigation Land

- Property. The Mitigation Land is classified as a Highest Priority Private Habitat Protection land in the Proposed 2015 Conservation Bond Program, as is the Subject Property.
2. Both the Subject Property and the Mitigation Property is classified generally as Arizona Uplands Subdivision of Sonoran Desertscrub plant community. Both are classified by the Sonoran Desert Protection Plan Mapguide as Sonoran Desertscrub Paloverde-Mixed Cacti Series.
 3. The three special species covered by the CLS Special Species designation are the Mexican spotted owl, the southwestern willow flycatcher, and the cactus ferruginous pygmy-owl. As referenced before, the Westland Resources report prepared during the Comprehensive Plan Amendment indicated that the first two species “have no potential to use the (subject) property.” Regarding the pygmy-owl, that report indicates that the property at one time was appropriate habitat but for some time it is thought that none indeed do inhabit the area. With respect to the Mitigation Land Westland Resources indicates that the first two special species would not have a potential for occurrence, which is consistent with the EPG Report findings, and both Westland Resources and EPG indicate that there would be a high likelihood of occurrence for the pygmy-owl. In fact Westland Resources reported that they are aware of an Arizona Game and Fish Department communication, in 1998, of a pygmy-owl in Cochise Canyon. One additional comment is that the Mitigation Land does show indications of the presence of Desert Tortoise, which would not be the case for the Subject Property according to Westland Resources.
 4. Neither parcel has perennial surface water. The Subject Property has intermittent surface water in the man-made drainageway along the north boundary and a within a very minor portion of the 30 foot easement on the south boundary. The Mitigation Land is free from even any significant intermittent surface water except for a short distance near the west boundary which Pima County indicates has less than 500 cfs. The Subject Property does not contain any unique land forms. The Mitigation Land is stunning in its extent of natural terrain and vegetation. It does also contain very interesting land forms.
 5. The Subject Property is isolated from any other open space property. The Mitigation Land is adjacent to other lands designated for open space (i.e. the adjacent Pima County owned property and potentially the adjacent Primavera Foundation property). Further the Mitigation Land is located in an area which is generally open space, that being the properties owned by the State of Arizona.
- D. The Mitigation Land will be dedicated to Pima County in connection with the rezoning. Pima County will manage the land as it does for the adjacent properties it owns. This condition is permanent.

The Development Team Process

Members of the Development Team have communicated with Carolyn Campbell of the Coalition for Sonoran Desert Protection all during the period of evaluating alternative properties for mitigation. Once the final parcel was identified an additional meeting with Ms. Campbell was held to promote the Cochise Canyon property as a suitable mitigation property. The qualities of the property were identified and discussed. The acreage of 27 acres was discussed in light of the special species 4:1 ratio and 32 acres of needed mitigation land, based on roughly 8 acres of disturbed property. Conditions were discussed to compensate for this shortfall. The Development Team offered that the unique status of the Mitigation Land in terms of its special vegetative qualities and its adjacency to other County owned lands should make up for this shortfall.

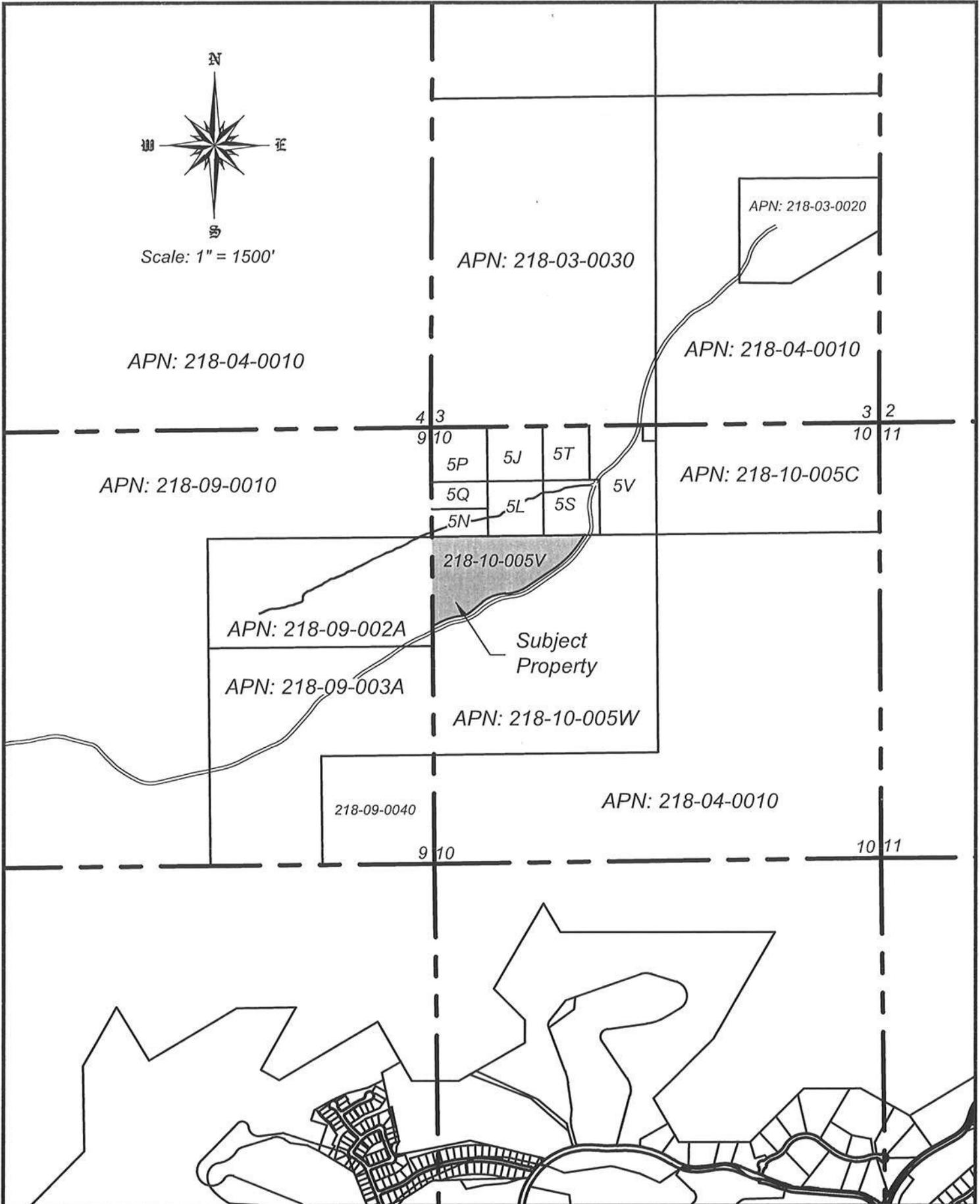
PRF3 LLC - BRIAR ROSE LANE PROJECT
The Offsite Mitigation Land

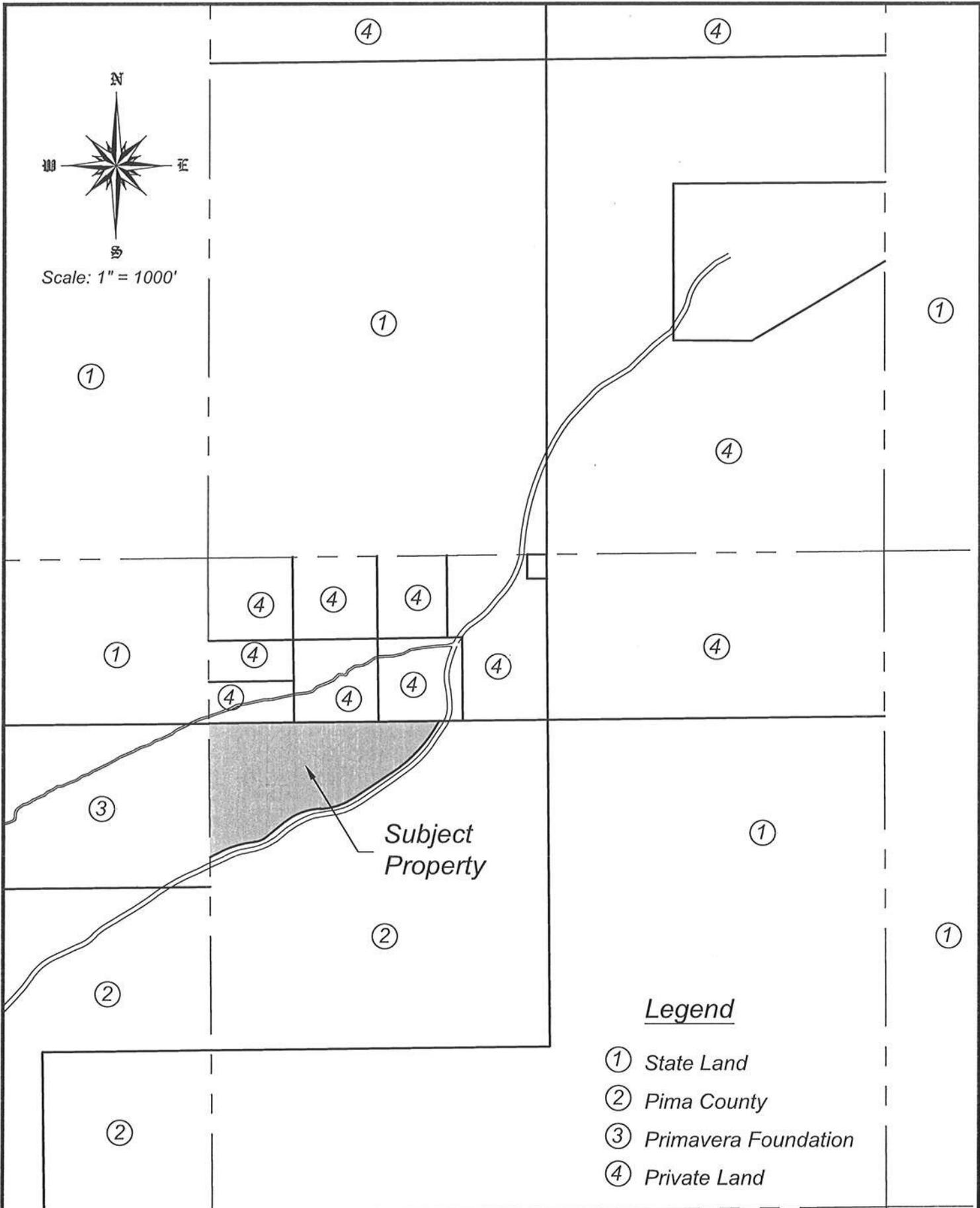
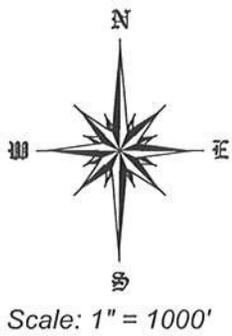
The Agreement with the Coalition for Sonoran Desert Protection

On April 7, 2015 Michael Marks and Charlie Bowles met with Carolyn Campbell and Christina McVie, both of the Coalition for Sonoran Desert Protection. Ms. McVie and Ms. Campbell indicated that they could support the designation of the subject 27 acre parcel as the suitable and acceptable mitigation land for the PRF3 project. They also discussed the subject of onsite plant preservation and moving some of plants onto the Arthur Pack Park property. An agreement was made to meet again to discuss specific rezoning conditions on the matter of plant mitigation. Since then Ms Campbell sent a set of conditions to Mr. Marks, who reviewed them as did with others on the project team. A modification of those conditions was prepared and forwarded back to Ms. Campbell for her review. It is expected that this set of conditions will be discussed further and that the Coalition will submit them to the County with a recommendation for inclusion in the final action.



Scale: 1" = 1500'





Legend

- ① State Land
- ② Pima County
- ③ Primavera Foundation
- ④ Private Land

APPENDIX

5. The Preliminary Integrated Water Management Plan (i.e. the PIWMP)

PRF3 – Briar Rose Lane Rezoning

Preliminary Integrated Water Management Plan

1. Water Context/Map

The subject development is within the Tucson Water Department service area. Exhibit 1 is a copy of the Pima County Mapguide with the Assured Water Supply/Designated Service Provider and the Section Grid layers turned on, in a regional context. Exhibit 2 is a copy of the same information in a local context.

2. Brief Description of Property's Existing and Historic Water Use

The property is currently undeveloped and has never been developed. Consequently, the property has no existing or historic water use.

3. Description of Property's Proposed Water Use

The Plan is to develop the property as a residential subdivision with 34 lots in the range of 6,000 to 11,324 square feet. These lots will accommodate single family detached housing. The plan is to serve these homes with potable water served by the Tucson Water Department. There is no active recreation area, however, there is open space which would be either left natural or natural and enhanced, with pedestrian paths, or for water harvesting that will contain transplanted plants. The residential project will be built in one phase.

4. Description of Water Supply Options and Proposed Method of Delivery

The proposed water supply will be from Tucson Water. It contains an 8" PVC main within the 30 foot Utility Easement along the south boundary of the subject property, as well as another 8" PVC main in Briar Rose Lane. Service to the subject property will be by way of a connection to one or both of these lines. See Site Analysis Report Exhibit I-G for the location of these lines. The designated water provider, i.e. Tucson Water, has an assured water supply designation from the State of Arizona Department of Water Resources. Tucson Water has already issued a 'will serve' letter for this project, and a copy is enclosed as Exhibit 3.

5. Water Demand Projections

5A. The planned zoning for the property is: CR-4 and the residential type is single family detached with a minimum of 6,000 square foot lots. Using the Checklist Table A for Estimated Baseline water Demand for Residential Land Use the Annual Demand per Home (in acre-feet) is 0.34. The total Net Estimated Water Demand is derived by multiplying the number of lots (i.e. 34) by the annual demand per home (i.e. 0.34 acre-feet). That number in this project is 11.56 acre-feet.

5B. The water conservation requirements will be satisfied by a commitment to obtain certification under the Pima County Green Building program, employing both indoor and outdoor conservation measures. The multiple water harvesting sites, indicated on the Site Plan, will play into this calculation.

6. Proximity to Renewable and Potable Water Supplies

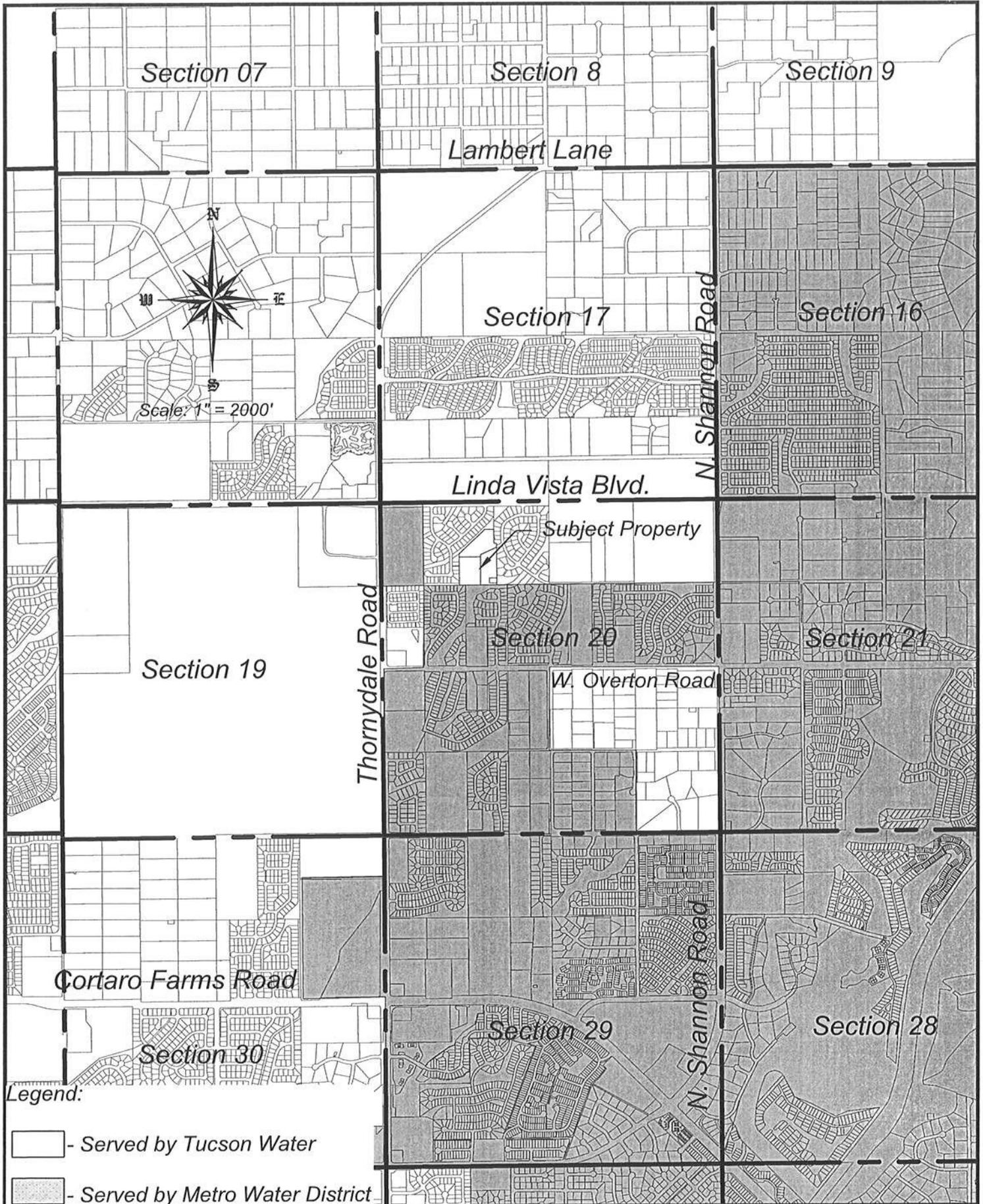
The Estimated Baseline Water Demand is less than 50 acres-feet/year and the project does have legal and physical access to Tucson Water water mains. Therefore the mapping described in this section is not required. As stated in Section 4 the connection to the Tucson Water system will be to one or both of the adjacent mains, one in the 30 foot easement along the south boundary and the other in Briar Rose Lane.

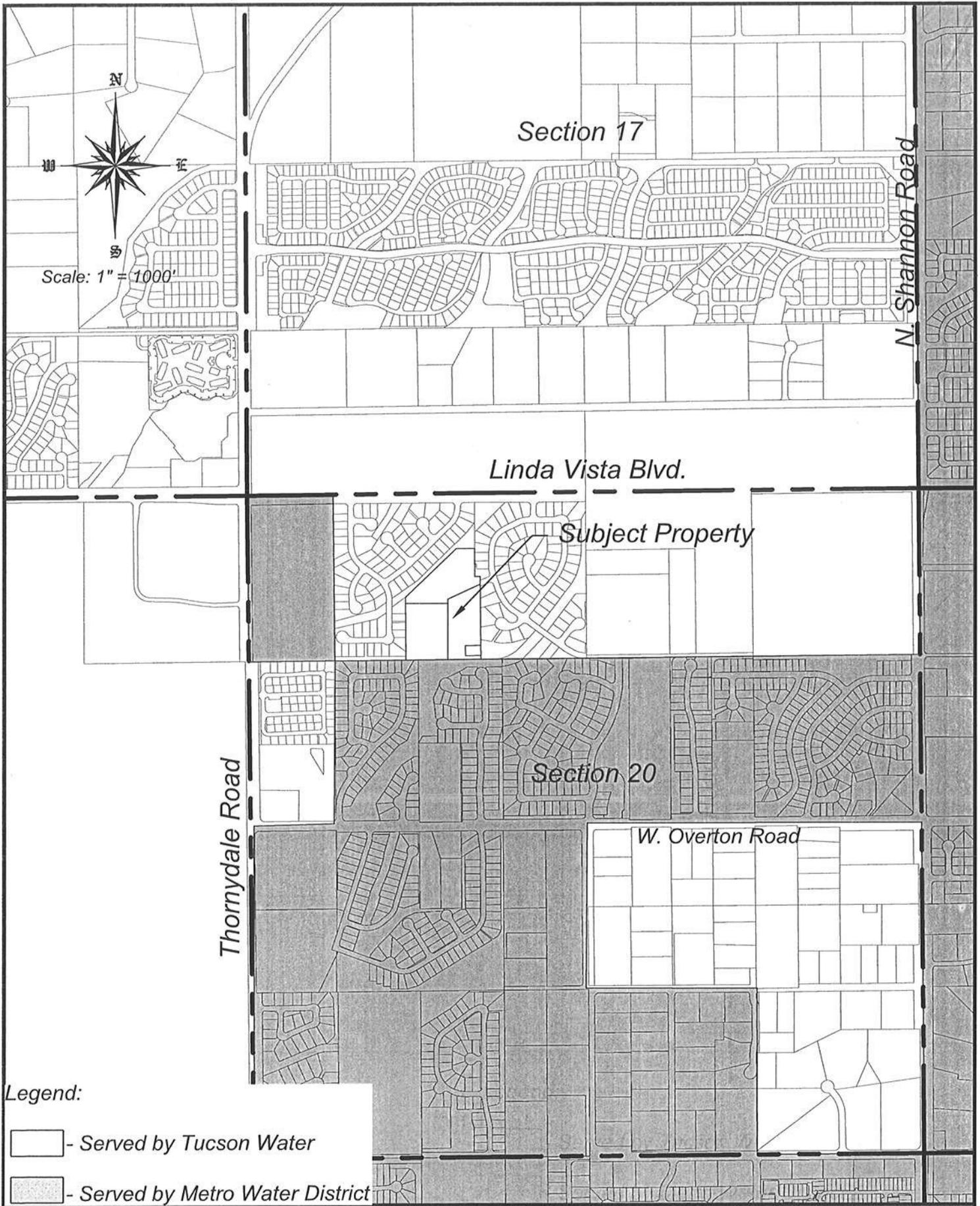
Items 7-11

None of these Items apply since all three conditions at the bottom of Page 3 of the Site Analysis Report Checklist for this PIWMP do apply.

12. Drawdown Analysis

This Item does not apply since the proposed project will not use 50 acre-feet / year and there is legal and physical access to a renewable source of potable water.





Legend:

 - Served by Tucson Water

 - Served by Metro Water District



CITY OF
TUCSON

TUCSON WATER
DEPARTMENT

March 7, 2014

MJM Consulting, Inc.
7002 E 4th Street
Tucson, AZ 85710

Attn: Michael Marks, AICP

SUBJECT: Water Availability for project: Linda Vista & Thornydale, APN: 22502004Q, 22502004V, 22502004P, Case #: WA1437, T-12, R-13, SEC-20, Lots: 9999, Location Code: UNI, Total Area: 9.7ac Zoning: SR, TR, CR-4

WATER SUPPLY

Tucson Water will provide water service to this project based on the subject zoning of the above parcels. Tucson Water has an assured water supply (AWS) designation from the State of Arizona Department of Water Resources (ADWR). An AWS designation means Tucson Water has met the criteria established by ADWR for demonstration of a 100-year water supply – it does not mean that water service is currently available to the subject project.

WATER SERVICE

The approval of water meter applications is subject to the current availability of water service at the time an application is received. The developer shall be required to submit a water master plan identifying, but not limited to: 1) Water Use; 2) Fire Flow Requirements; 3) Offsite/Onsite Water Facilities; 4) Loops and Proposed Connection Points to Existing Water System; and 5) Easements/Common Areas.

Any specific area plan fees, protected main/facility fees and/or other needed facilities' cost, are to be paid by the developer. *If the existing water system is not capable of meeting the requirements of the proposed development, the developer shall be financially responsible for modifying or enhancing the existing water system to meet those needs.*

This letter shall be null and void two years from the date of issuance.

Issuance of this letter is not to be construed as agency approval of a water plan or as containing construction review comments relative to conflicts with existing water lines and the proposed development.

If you have any questions, please call New Development at 791-4718.

Sincerely,

Scott Schladweiler, P.E.
Engineering Manager
Tucson Water Department

SS:ka

CC:File

NEW DEVELOPMENT • P.O. BOX 27210 • TUCSON, AZ 85726-7210
(520) 791-4718 • FAX (520) 791-2501 • TTY (520) 791-2639 • www.cityoftucson.org



Appendix 5
Exhibit 3