

PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT - PLANNING DIVISION  
STAFF REPORT TO THE PLANNING AND ZONING COMMISSION

**HEARING** September 28, 2016

**DISTRICT** 3

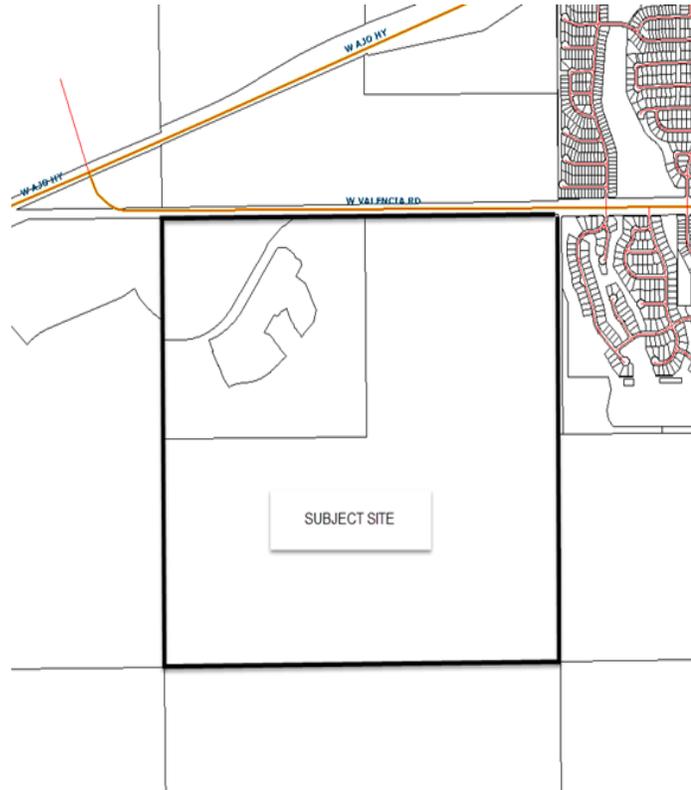
**CASES** Co23-08-02  
Pomegranate Farms  
Tucson LLC Specific  
Plan

**REQUEST** Modification of Specific  
Plan - (Substantial/Non-  
substantial Changes) on  
645 acres (parcels 210-  
40-022A; 023E; 023F;  
023G)

**OWNER** Pomegranate Farms  
Tucson LLC and  
Pomegranate Farms  
Commercial Tucson LLC  
3808 N. Sullivan Road  
Ste 202 Bldg N15  
Spokane Valley, WA  
99216-1608

**APPLICANTS** LVA Urban Design  
Studio LLC  
120 S. Ash Avenue  
Scottsdale, AZ 85281

Psomas  
333 E. Wetmore Road  
Tucson, AZ 85705



**LOCATION**

South of Ajo Highway, approximately 2,000 feet east of the intersection of W. Valencia Road and Ajo Highway in Section 18, T15S, R12E. (District 3)

**APPLICANT'S STATED REASON**

The Pomegranate Farms Specific Plan was envisioned during the peak of the real estate market based on extremely ambitious goals and development requirements. The real estate market in Tucson changed dramatically and "this change has resulted in the need to amend various elements of the specific plan to bring it in line with today's market conditions." The basic vision will be maintained, but various provisions would be aligned with market conditions. Reference the applicant's request letter for reasons for specific modifications.

## **COMPREHENSIVE PLAN DESIGNATION**

The comprehensive plan designation of the site is Planned Development Community (PDC). The objective of PDC is to designate existing, approved specific plans. Specific plans comprise a unique zoning regimen within a planned community. Specific plan documents include detailed information on the intent for the community as a whole, as well as the individual planning and zoning districts within the specific plan area.

## **SURROUNDING LAND USES / GENERAL CHARACTER**

North:	RH	Undeveloped, Valencia Road, Ryan Airfield further north across Ajo Highway
South:	RH	Undeveloped
East:	TR, CB-1, RH	Residential, Undeveloped
West:	SP	Sendero Pass Specific Plan (undeveloped)

## **STAFF RECOMMENDATION**

Staff recommends **APPROVAL** of the Modification of Pomegranate Farms Specific Plan request subject to the following revised conditions (in addition to the existing unchanged conditions – see attached Ordinance 2009-41):

1. Not more than 60 days after the Board of Supervisors approves the amended Specific Plan, the owner(s) / developer(s) shall submit to the Planning Director the amended specific plan document, including any necessary revisions of the specific plan document reflecting the final actions of the Board of Supervisors, and the specific plan text and exhibits in an electronic and written format acceptable to the Planning Division.
  
12. Transportation Department requirements:
  - A. ~~The property owner/developer(s) shall dedicate 200 25 feet full of right-of-way, or 100 feet half right-of-way as applicable, for Valencia Road as designated by the Major Streets and Scenic Routes Plan. The alignment of Valencia Road shall require approval by the Department of Transportation and shall be coordinated with adjacent development. The right-of-way shall be dedicated within 90 days of Board of Supervisors approval of the modification of the specific plan.~~
  
  - B. ~~The property owner/developer(s) shall dedicate 150 45 feet half right-of-way, or 75 feet half right-of-way as applicable, for Los Reales Road and 120 feet right-of-way, or 60 feet half right-of-way as applicable, for Desert Sunrise Trail per recommended findings of the Southwest Infrastructure Plan necessary right-of-way for the internal loop road, north/south connector road, and shared access road to Valencia Road as indicated in the Traffic Impact Study, when approved.~~
  
  - C. ~~A building setback of 130 feet shall be provided on Valencia Road, 105 feet shall be provided on Los Reales Road and 90 feet on Desert Sunrise Trail shall be provided (half right of way plus 30 feet that is measured from the centerline of the right of way/roadway). For development along the portion of Valencia Road, Los Reales Road and Desert Sunrise Trail, within high density and commercial developed areas, reduction of setbacks to 10 feet plus half of the required right-of-way may be allowed as previously discussed by the Design Review Committee. The property owner/developer(s) shall provide improvements~~

to Valencia Road and Los Reales Road as determined necessary by an approved traffic study. Construction of Los Reales Road is the responsibility of the property owner/developer(s).

~~D. The property owner/developer(s) shall provide on-site and off-site improvements to Valencia Road, Los Reales Road and Desert Sunrise Trail as determined necessary by the Department of Transportation. Construction of Los Reales Road and Desert Sunrise Trail are the responsibility of the property owner/developer(s) and the property owner/developer(s) may be eligible to receive impact fee credits after construction is completed. Los Reales Road construction includes the north half ultimate cross section of a four-lane divided or five-lane desert parkway/urban major collector. Desert Sunrise Trail construction includes the full cross section of a four-lane divided or five-lane desert parkway/urban major collector. Improvements to Valencia Road could include, but may not be limited to, additional pavement for travel, turn or multi-use lanes, outside curb and sidewalks. This condition may be clarified or amended pursuant to a Board of Supervisors approved Development Agreement between Pima County and the owner/developer(s). Adequate circulation shall be provided by including cross access between the project and all adjacent undeveloped areas.~~

~~E. The property owner/developer(s) shall dedicate right-of-way and construct a major collector road (within E.1 and D.4 districts), to be located opposite Collector 2 that is located within the Town Center. The road shall provide a connection between Valencia Road and the north property line. It is located within the commercial and multiple use areas designated E.1 and D.4 to provide future access to property located north of the specific plan. The width of said road shall be subject to approval during platting process, depending upon what type of commercial development is planned. In the event that Valencia Road is not aligned as indicated in the Specific Plan, then this condition is not applicable. A detailed and up-to-date Traffic Impact Study shall be submitted with the Master Block Plat and shall be updated as determined necessary by the Department of Transportation throughout the development of the specific plan.~~

~~F. Minimum separation between driveways and streets shall be 600 feet along Valencia Road, Los Reales Road and Desert Sunrise Trails. All access shall require Department of Transportation approval. One Park and Ride facility shall be designated in the commercial area along Valencia Road and its location shall be coordinated with Suntran. Commercial parking lots with greater than 50 parking spaces shall not prohibit commuter parking.~~

~~G. Provision of access from the internal loop road to the southeast boundary of the specific plan to provide future access to undeveloped property to the east. Access shall be designed to provide cross access between commercial developments. Shared driveways shall be used along Valencia Road to minimize the number of access points.~~

~~H. Provision of a detailed and up to date Traffic Impact Study shall be submitted with the Master Block Plat and shall be updated as determined necessary by Department of Transportation throughout the development of the specific plan. Each parcel shall be designed to establish coordinated bicycle and pedestrian connections within the specific plan and plan for future connections beyond the limits of the specific plan.~~

~~I. Two Park & Ride facilities shall be provided for within the specific plan, one within the town center or commercial uses along Valencia Road and one along Los Reales Road. The property owner/developer(s) shall provide a study/report that addresses transit issues for the specific plan and how it interrelates within the southwest area.~~

~~J. Each district shall be designed to establish coordinated pedestrian and transit oriented connections within the specific plan and plan for future connections beyond the limits of the specific plan.~~

13. Regional Flood Control District requirements:

A. Drainage improvements required to remove the developable portions of the site from the FEMA floodplain will be identified in a drainage report to be finalized with the Master Block Plat. Approval of the Drainage Report ~~and CLOMR~~ shall be required prior to recordation of the Block Plat and approval of the Certificate of Compliance. Approval of the LOMRs by the District and submittal to FEMA is required prior to ~~issuance of any building permits~~ release of assurances for each Block.

B. Drainage corridors identified in the Specific Plan are to be enhanced to provide riparian habitat connectivity across the site as well as recreational and aesthetic amenity to the residents. ~~If a riparian mitigation plan is required, it~~ A Conservation Plan shall be submitted for approval with the Block Plat and prior to the Certificate of Compliance in order to ensure sustainability principles identified by the County and Specific Plan are implemented.

C. Drainage improvements shall be designed in coordination with Ajo Highway and neighboring developments.

D. Due to the proposed land use intensities and severe flood and erosion hazards, flood control improvements within the flow corridors and regulatory floodplains within the Blocks shall be constructed with natural bottoms and with channel banks protected with concrete, gunite, soil cement, or other structural methods. Unless otherwise justified as non-erosive, Earthen channels banks shall not be allowed. Channels associated with non-regulatory flows may be fully lined.

E. Flow corridors shall be a minimum of 200 feet wide.

F. Water conservation measures identified in the Specific Plan shall be implemented with the development. Where necessary as determined at the time each subdivision plat or development plan is submitted, provisions for permanent maintenance of these measures may also be required to be included in the project's CC&Rs and final conservation measures shall be submitted to the District for review and approval.

G. Riparian habitat mitigation plans for each Block, if required, shall enhance the flow corridors by providing mitigation within the corridor and within the detention and first flush retention facilities located adjacent to the corridors.

15. Natural Resources, Parks and Recreation Department requirements:

A. Prior to the release of assurances for ~~the 1,038<sup>th</sup> lot (30%~~ 75% of the lots), the approximate seven-acre park and all associated and required recreation elements shall be constructed.

B. Prior to the release of assurances for ~~the lots greater than 75% of the total lots within each district parcel~~ as shown on the Phasing Plan (Exhibit IV-A-6I), recreation elements and trail locations shall be built as conceptually shown on Exhibit II-ML within that district parcel.

C. The 10-foot shared-use path and eight-foot stabilized trail within the residential collector road shall be constructed by the developer and maintained by a Homeowners Association.

D. A Homeowners Association shall maintain all shared-use paths and stabilized trails throughout the development.

E. Final determination of recreation areas and elements required shall be determined with a Recreation Area Plan (RAP), which shall be submitted and approved prior to the approval of the tentative plat. A RAP shall be submitted for each district parcel. Each district parcel shall meet the recreation requirements as stated in Section 18.69.090 and the Recreation Area Design Manual.

F. A Recreation Area Plan (RAP) shall be submitted with the Tentative Master Block Plat. The RAP shall show the alignment of the trails within the open space as shown on Exhibit II-ML. The RAP shall include the park and show the required recreation elements.

19. Adherence to the amended specific plan document as approved at the Board of Supervisor's public hearing.

~~22. At a minimum, the majority of infrastructure and transportation costs shall be self-funded by the developer, including but not limited to impact fees. A development agreement to address, at minimum, infrastructure commitments, phasing, and funding shall be developed and approved by the Board of Supervisors prior to submittal of a Master Block Plat. No permits shall be issued until the revisions to the Pima County development impact fee program are adopted by the Board of Supervisors.~~

~~23. Any proposal or action which would result in a significant deviation from the objective of providing or reserving the necessary acreage for commercial services within ¼ - ½ mile of all residential development (as stated in the specific plan) or the general dispersal of commercial services to serve the residential development of the specific plan, would be considered a "Substantial Modification" of the specific plan requiring public hearings before the Planning and Zoning Commission and the Board of Supervisors per Section 18.90.080.~~

~~2422. Owner/Developer shall reach an agreement with Tucson Unified School District (TUSD) or another public school provider regarding the provision of a school location within the development as shown and described in the sSpecific plan. TUSD and Owner/Developer have begun negotiations. If the agreement is with TUSD, the agreement will be in substantial conformance with the Letter of Intent dated February 13, 2009 between~~

~~Owner/Developer and TUSD or otherwise mutually acceptable to TUSD and Owner/Developer.~~

## **STAFF REPORT**

Because the specific plan documents themselves are regulatory, in addition to the conditions, modifications of specific plans often include revisions not seen with standard rezonings. This is true of the Pomegranate Farms modification request which also includes revising or waiving some prominent themes of the existing specific plan and some of the development and design standards of the plan.

### **Modification Request**

The components of the proposed modification with a brief summary are listed below:

#### **I. Modify Ordinance (2009-41) Conditions:**

#19: *“Adherence to the specific plan document as approved at the Board of Supervisor’s public hearing.”* Regulatory components of the specific plan include the land use designations, development standards, land use and road layout, density table, and conceptual illustrations.

- Land use designations, including permitted uses - The modified plan replaces the existing designations with a different but equally reasonable set of designations more appropriate to the applicant’s purpose. Staff has no objection to replacing the designations.
- Land use designation development standards - The modified plan replaces the existing development standards (e.g. setbacks, maximum height, lot size) with a much clearer, simpler set of development standards more appropriate to the applicant’s purpose. The replaced development standards will be much easier to implement. Staff reviewed the replaced standards and has no objection to them.
- Land use configuration and acreages - Many of the proposed changes to the land use configuration or layout are due to administrative revisions to the wash configuration and to the Valencia Road alignment. The designated wash area is reduced but the Important Riparian Areas and other key washes remain. The more intense land uses are located along the Valencia Road alignment rather than throughout the site. The southern portion is more homogenous with almost entirely Low Density Residential (LDR) and washes designated. The “*parcels*” are larger in size than the previous “*districts*”. Overall, the development is less varied. The school and associated park have been moved south. The borrow pit (i.e. sand or gravel pit) has been separated from other designations. There is a reduction of approximately seven acres of trails from 19.6 acres to 12.9 acres. Open space is reduced from 194 acres to 138 acres (164.5 acres with the 22.7 acres of enhanced open space (i.e. borrow pit)) due to the same administrative revisions to the washes.
- Road configuration (other than Valencia Road) - There is less emphasis on Los Reales Road although potential connectors are retained if necessary. The loop road is reconfigured with Desert Sunrise Trail as the western boundary of the loop road. Since the existing specific plan was approved, the (former) Major Streets and Scenic Routes Plan (now two separate plans) has been updated and is reflected in the revised transportation

conditions. The Department of Transportation has no objection to the proposed modification.

- Minimum and maximum numbers of dwelling units and residential densities - The minimum and maximum dwelling unit numbers are reduced. The applicant argues that the existing densities are unlikely in this area. They have been reduced by 40 – 50% (from a density range of 4.8 - 7.0 RAC to 2.0 - 4.1 RAC). With the modified plan, the higher intensity development proposed along Valencia Road is not significantly different from the existing plan but the density of the southern half of the site has been notably reduced. Some of the earlier focus on Ryan Airfield as an employment center has shifted to the Aerospace Parkway area although Ryan could still attract development in the future. Staff has no objection to the reduced densities as proposed.
- Conceptual development illustrations and the color palette (delete entirely) - Staff has no objection to the removal of the illustrations and palette which are of limited value in implementing the specific plan.

#23: “... providing or reserving the necessary acreage for commercial services within  $\frac{1}{4}$  -  $\frac{1}{2}$  mile of all residential development (as stated in the specific plan) or the general dispersal of commercial services to serve the residential development of the specific plan...”. The modified plan replaces the requirement to provide commercial services within walking distance of all residences with providing residential and commercial uses within the overall 645-acre development site. Most residents will still have commercial services within walking distance except the south  $\frac{1}{4}$  of the development will be more than  $\frac{1}{2}$  mile from services. Staff supports provisions for pedestrian access to commercial services and holds more belief than the applicant does that commercial services in the southern half of the site are possible. However, commercial services will be provided for in the northern half and if the pedestrian circulation is inviting (shaded, safe) commercial services may still be accessible by walking.

#24: “Owner/Developer shall reach an agreement with Tucson Unified School District (TUSD) or another public school provider regarding the provision of a school location within the development as shown and described in the specific Plan. TUSD and Owner/Developer have begun negotiations. If the agreement is with TUSD, the agreement will be in substantial conformance with the Letter of Intent dated February 13, 2009 between Owner/Developer and TUSD or otherwise mutually acceptable to TUSD and Owner/Developer.” Staff finds this original letter of intent no longer valid. The applicant is working with TUSD on an acceptable agreement to replace the existing letter. Staff has requested a status report from TUSD on their discussions.

## **II. Modify Certain Primary Themes of the Specific Plan**

- Waive the requirement for 50 acres of “floating” Community Activity Center “located throughout the project...” This item which is intended to promote pedestrian access to commercial services is the same as discussed above with Condition #23. Commercial development is no longer proposed throughout the site but is focused on the northwest corner and along Valencia Road. Staff has no objection to this modification.
- Waive the requirement for compact development created through high-density, vertical residential development. The applicant states that compact development and a high level of density is not viable in this area. The existing plan’s high density was proposed by the original owner and supported by staff because that is what Growing Smarter, the

Southwest Infrastructure Plan (SWIP), and the comprehensive plan amendment promoted. Now staff agrees that not quite such a high level may be possible, however a minimum density with a system for distributing the density is still proposed by the modified plan to avoid inefficient use of infrastructure and land.

### III. Modify Certain Regulatory Design Standards of the Specific Plan

- Revising, replacing, or waiving certain measurable sustainability standards: Some standards are revised by the modified plan to be promotional rather than mandatory. For example, standards such as, “*Achieve a minimum LEED Silver Certification for commercial and municipal buildings...*”, “*Incorporate solar and alternative energy components into all buildings*”, “*Use municipal and commercial roof tops for solar panel installation*”, “*Provide solar water heaters for residential buildings*” are replaced in the modified plan by promotional language such as “*encourage*”.

The applicant states that these standards are too restrictive given the current housing market. While the staff acknowledges the market, that argument only goes so far. The need for a certain level of sustainable development should not fluctuate with the market. Developing sustainably is the subject of goals and policies within the recently-updated Comprehensive Plan. For example, “*Goal 2: Minimize the negative impacts of climate change on Pima County and increase the resiliency of the human, economic, and natural environment*” and “*Policy 3: Reduce greenhouse gas emissions and heat island effects by:... c) Continuing to increase energy efficiency including energy efficiency standards in both County-owned and privately owned buildings;*” and “*Goal 14: Encourage cost-effective green building and site design methods, techniques, and materials*” and “*Policy 4: Increase building energy efficiency by encouraging active and passive solar methods of construction.*” The SWIP Principle ENV-10 states, “*Promote energy conservation and efficiencies and encourage the use of renewable energy sources.*” and Principle Env-11 states, “*Support “green building” concepts and programs for residential, commercial and industrial buildings and developments.*” Sustainable development can be cost effective and pay off in the long term; it should not be considered a marginal luxury. Given this region’s solar resources, some integration of solar features into building residential and non-residential structures should be made. Staff has no objection to these modifications but with concern that by making the standards more flexible and not mandatory it does not render them meaningless; that the owner/developer(s) will maintain a commitment towards a quality, sustainable development.

Some design standards are replaced in the modified plan by new standards the applicant believes are more attainable. For example, the design standard that, “*No more than 50% of garage doors shall directly face the street*” is proposed to be replaced with, “*Homes on lots greater than 50’ in width shall include a variety of garage bay configurations when more than two front-loaded garage bays are provided, including combinations of front-loaded, side entry, recesses, staggered and/or rear-entry garages. For lots less than 50 feet, no more than two front-facing garage on the same plane shall be permitted.*” Staff has no objection to these replacements.

- Replacing a two-tiered system of design standards with one set of design standards: Some of the design standards of the existing plan were left vague with the strategy to fine-tune or make them implementable pushed to the Master Block Plat stage. The two-tiered system of delaying the fine tuning to the Block Plat stage was a way to deal with the

original specific plan's compressed timeline. The modified plan deletes or replaces most of the unfinished standards so a second tier is no longer necessary. Staff has no objection to this revision.

- Waiving the specific design standard which states “*Establish a mechanism to collect funds from solar use, HOA dues, and voluntary transfer fees each time a residential unit is sold or resold, to be used for community programs, maintenance, facilities and to subsidize housing for educators, fire and police employees that live in the community.*” This is a questionable standard, not entirely clear and not necessarily implementable. Staff has no objection to its removal.

### **Administrative Modifications**

The specific plan grants authority to the Planning Official to make administrative changes to the specific plan without a public hearing or legislative review. The authority is stated in the specific plan.

The following revisions were determined by the Planning Official to be “*Administrative Modifications*” and are provided to the Commission and Board for background information, they are not part of this legislative action:

1. The requirement for mixed-use development “*all in one place*” or vertical development with commercial/retail on the first floor and residential above has been waived.
2. Replacing the design standard to provide shade for at least 35% of all pedestrian circulation areas with “*Desert shade trees shall be planted at a minimum of one shade tree every 50 feet along trail corridors and primary pedestrian circulation areas to provide shade within primary pedestrian circulation areas. In addition, along the primary trail corridors, a pedestrian seating area and shade element shall be provided every ¼ mile to provide a comfortable refuge for pedestrians along the trail corridors.*” has been approved.
3. The requirement to provide affordable housing program has been waived since Pima County no longer enforces the affordable housing policy with rezoning cases.
4. Based on Administrative Modification “L”, “*Administrative modifications can be made when there is a net reduction in the Open Space, as recommended by the US Army Corps of Engineers to reduce the number of 404 washes...*” In other words, the designated wash area can be reduced if the Army Corps of Engineers determines the washes don't initiate Section 404 of the Clean Water Act. The Regional Flood Control District and the Planning Official have reviewed and accepted the revised wash configuration.
5. Administrative Modification “M” allows changes to specific plan based on the realignment of Valencia Road, which is planned. Administrative modifications can be made if the Town Center configuration changes because of a different alignment of Valencia Road. Pima County Department of Transportation and the Planning Official have reviewed and accepted this change.
6. The prohibition on gated communities was lifted subject to the requirement to provide pedestrian access into any gated community.

7. The requirement to “*incorporate transit stops into the layout of all developments, regardless of current service availability*” was replaced with providing a transit stop, at minimum, on Valencia Road and in coordination with the RTA plans.

### **Summary**

The modified specific plan is, as expected, more flexible for the developer, but the modified plan is also much clearer, less repetitious, better organized and therefore more effectively implemented than the existing specific plan. Some changes in the modified plan were anticipated by the existing plan (e.g. the washes and the Valencia Road realignment). Other changes were not predicted (and remain to be seen) such as some shift from Ryan Airfield as an employment center to the Aerospace Parkway area. Some of the changes in the modified specific plan simply work better for the current owner’s purpose.

Admittedly, the modified specific plan is less aspirational than the existing specific plan. The modified plan does not mandate as rigorous green building standards, or that there be ¼ - ½ mile access to commercial services by all residents (although commercial services will be accessible by most residents), or require vertical mixed use (residential uses over commercial/office uses in the same building), or as dense and compact of development as originally envisioned. Many of the exceptional standards in the existing specific plan were proposed by the original owner and staff supported them, particularly the sustainable standards, because they implemented Growing Smarter, SWIP and comprehensive plan principles. The current owner maintains that some of the standards are not viable, necessitating this modification request.

Over the past several months, the current owner and his consultants have worked extensively with staff to create a modified plan that staff can support. The basic features such as pedestrian/bike circulation, availability of commercial services in the area, protection of the washes, and some level of sustainable building are still proposed by the modified plan. With the current owner’s commitment, the modified Pomegranate Farms could be an equally well done, quality development with sustainable elements.

### **Concurrency**

The modified plan represents a reduction in the proposed intensity of the development; concurrency will be met.

### **Maeveen Marie Behan Conservation Lands System (MMBCLS)**

The site is within the MMBCLS and has Important Riparian Areas (IRA).

### **Specific Plan Case History**

Several comprehensive plan amendments in the southwest area along with the SWIP laid the groundwork for this specific plan as well as Sendero Pass Specific Plan to the immediate west. Both plans were tied to SWIP’s sustainable building principles and funding approach and the concept of Ryan Airfield developing as an employment center. Reasons for supporting the specific plans at the time were the southwest being a defacto growth area, promoting the MMBCLS by providing for growth in an area that is largely outside of the MMBCLS, promoting Ryan Airfield as an employment center, rational use of the existing roadway infrastructure, establishing infrastructure connections for the abutting state land, promoting State Growing Smarter Acts through mixed use and compact development with multi-modal transportation options, and that SWIP expected sustainability standards were proposed. On February 17, 2009 the specific plan was approved by the Board of Supervisors.

## **TRANSPORTATION REPORT**

The Department of Transportation has reviewed the proposed modifications to the Pomegranate Farms Specific Plan and has no objections to the request. The Department has met with the design and traffic engineers on this project to ensure adequate infrastructure, circulation, and coordination with neighboring development. The Department is currently designing the segment of Valencia Road adjacent to this site, extending west to the intersection with Ajo Highway. Construction of this segment should go out to bid in early 2018 with an anticipated construction completion date of 2020. The capacity of Valencia Road will be approximately 35,800 ADT upon completion of these improvements.

The current traffic volume on Valencia is approximately 4,000 ADT. The Specific Plan states that the 2045 traffic projection is 27,300 ADT including the site traffic from this development. For the purposes of the traffic study, the estimated trip projection for this project is approximately 22,800 ADT, a third of which will go west to Ajo Highway. Because the commercial and office uses are yet to be determined, the total traffic from this site is still an estimate. A full traffic study will be done with the block plat, with updates as development progresses. The requested changes to the specific plan show a reduction in densities and thus an overall reduction in traffic from the original projections at the time of the approval of the specific plan. Therefore, the impact to the local traffic network will not be as substantial as previously approved.

The site plan has been revised to reflect the current alignment of Valencia and the connector roads between this development and the Sendaro Specific Plan to the west. An internal loop road has been realigned to reflect changes to the drainage corridors and the revised site configuration. The north/south connector road between Los Reales and Valencia has been relocated to a conceptual alignment. The exact location will be determined at the time the southwestern blocks are developed.

The Department of Transportation has no objection to the proposed changes and recommends the conditions of the Specific Plan be modified as depicted in the staff recommendation above.

## **FLOOD CONTROL REPORT**

The District agrees that the drainage corridor alignment and approach described in the Specific Plan can be shown to meet floodplain management ordinance requirements at the time of development as indicated by the Deputy Director's Signature on the May 26, 2016 letter from Jerald L. Curless, PE of CMG Engineering. Additional corrections requested have been provided.

The District has agreed that the Conservation Plan that was to have been provided with the Specific Plan shall be provided with the Master Block Plat at the same time as the master drainage study.

Although water conservation measures are listed beginning on page 98, no Preliminary Integrated Water Management Plan has been submitted as it was not required when the original plan was created. It should be noted that the LEED Silver Certification requirement the applicant proposes to remove from the commercial areas is one option for meeting water conservation goals. However, alternatives are available and we do not oppose this deletion.

As required, staff has conducted the Water Resources Impact Analysis (WRIA) as follows:

- a. The water provider is not known. (*DSD staff note: It's Metropolitan Water District*)

- b. Per the ADWR Well Inventory, the closest wells, including those owned by Tucson Water along Valencia Road at Ryan Field, had depths to groundwater over 394 feet, and as deep as 600 feet east of South Vahalla Road.
- c. While there was 2 - 3 inches of subsidence between 1987 and 2005, this site is not located within a covered subsidence zone as defined by the Site Analysis Requirements.
- d. The site is not within a mile of a Groundwater Dependent Ecosystem. The location of wells to serve the site is not known.
- e. The site is within the Avra Hydrogeologic Basin, and the depth to bedrock is 1600-3200 feet.

The project is not expected to have adverse impacts on groundwater dependent ecosystems.

In conclusion, the District has no objection subject to the conditions as depicted in the staff recommendation above.

#### **ENVIRONMENTAL PLANNING REPORT**

Office of Sustainability and Conservation - Environmental Planning has no objection to this request.

#### **WASTEWATER RECLAMATION REPORT**

The Planning Section of the Pima County Regional Wastewater Reclamation Department (PCRWRD) has reviewed the request to modify the Pomegranate Farms Specific Plan. The modification request consists of the multiple revisions to rezoning conditions, however no revisions to wastewater rezoning conditions are proposed. The PCRWRD has no objection to the requested modification of rezoning conditions.

The specific plan area is within the PCRWRD service area and is tributary to the Avra Valley Water Reclamation Facility. The nearest public sewer is approximately 3,300 feet east of the plan area in Valencia Road. A proposed shared capacity concept of the offsite trunk sewer between Pomegranate Farms and Sendero Pass has been approved by PCRWRD. The proposed 21-inch offsite trunk sewer starts northwest of Pomegranate in Ajo Highway, then turns north and runs parallel to the east boundary of Ryan Airfield, where it connects to the existing 21-inch public sewer.

#### **NATURAL RESOURCES, PARKS AND RECREATION REPORT**

No objection to this request.

#### **CULTURAL RESOURCES REPORT**

Two archaeological sites, AZ AA:16:481(ASM) and AZ AA:16:482(ASM), both eligible for listing in the National Register of Historic Places, are located on the property. Cultural resources mitigation of the archaeological sites is required. The preferred mitigation strategy is avoidance and preservation of both sites. A mitigation plan shall include a preservation strategy that runs with the land, such as a Conservation Easement, a Restrictive Covenant, or recordation on the original Plat submitted to the County. In recording the sites, the Plat map must clearly delineate the spatial extents of the sites with buffer zones and must include a descriptive Plat Note. If avoidance and preservation are not possible, data recovery will be required. If data recovery should become necessary, all archaeological work shall be conducted by an archaeologist permitted by the

Arizona State Museum. Any development requiring a Type II grading permit will be reviewed for compliance with Pima County's cultural resources requirements under Chapter 18.81 of the Pima County Zoning Code.

OSC review of submitted application and supporting cultural resources documentation has determined that the proposed development project has a potential to negatively affect significant cultural and/or historic resources. Cultural resources actions are required to mitigate negative effects to significant archaeological and/or historic resources before clearance can be issued for the proposed development project. The applicant and/or project proponent should contact OSC at 520-724-6940, or email: Cultural.Resources.DSD@pima.gov, for assistance in complying with pertinent County, State, and/or Federal cultural resources requirements.

**DREXEL HEIGHTS FIRE DISTRICT**

See attached comments.

**TUCSON AIRPORT AUTHORITY (TAA) - RYAN AIRFIELD**

See attached comments including the notice to the developer below.

Staff cross-checked the enclosed Airport Disclosure Statement and Declaration of Avigation Easement with the same documents found in Appendix 3 of the existing specific plan and found only one difference (existing Declaration of Avigation Easement specifies the year "2004"). That existing page will be replaced with the enclosed correct page.

**TAA Notice to Developer:** The developer shall file Form 7460 with the FAA before beginning construction of each phase of the Pomegranate Farms Specific Plan. When filing Form 7460 please focus on the highest structure contained within the constructed phase. Any cranes used for the project must also be identified with Form 7460. Please file Form 7460 at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>

**METROPOLITAN WATER DISTRICT**

No comments have been received to date.

**TUCSON WATER**

No comments have been received to date.

**SUN TRAN**

No comments have been received to date.

**ARIZONA DEPARTMENT OF TRANSPORTATION (ADOT) REGIONAL TRAFFIC ENGINEER**

No comments have been received to date.

**TRICO**

No comments have been received to date.

**TUSD SCHOOL DISTRICT**

No comments have been received to date.

**KITT PEAK NATIONAL OBSERVATORY**

No comments have been received to date.

**UNITED STATES FISH AND WILDLIFE SERVICE**

No comments have been received to date.

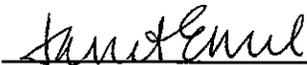
**TOHONO O'ODHAM NATION**

No comments have been received to date.

**PUBLIC COMMENT**

To date, staff has not received any written public comment pertaining to this request.

Respectfully Submitted,



---

Janet Emel  
Senior Planner

c: Pomegranate Farms Tucson LLC and Pomegranate  
Farms Commercial Tucson LLC  
3808 N. Sullivan Road, Ste 202 Bldg N15  
Spokane Valley, WA 99216-1608

LVA Urban Design Studio LLC  
120 S. Ash Avenue  
Scottsdale, AZ 85281

Psomas  
333 E. Wetmore Road  
Tucson, AZ 85705

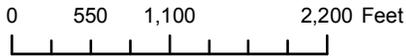
Case #: CO23-08-02

Case Name: POMEGRANATE FARMS SPECIFIC PLAN

Tax Code(s): 210-40-022A, 210-40-023E, 210-40-023F, 210-40-023G



Pictometry International Corp. USDA National Agricultural Imagery Program (NAIP). Pima County Association of Governments (PAC).



## PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT PLANNING DIVISION

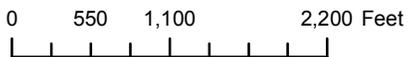
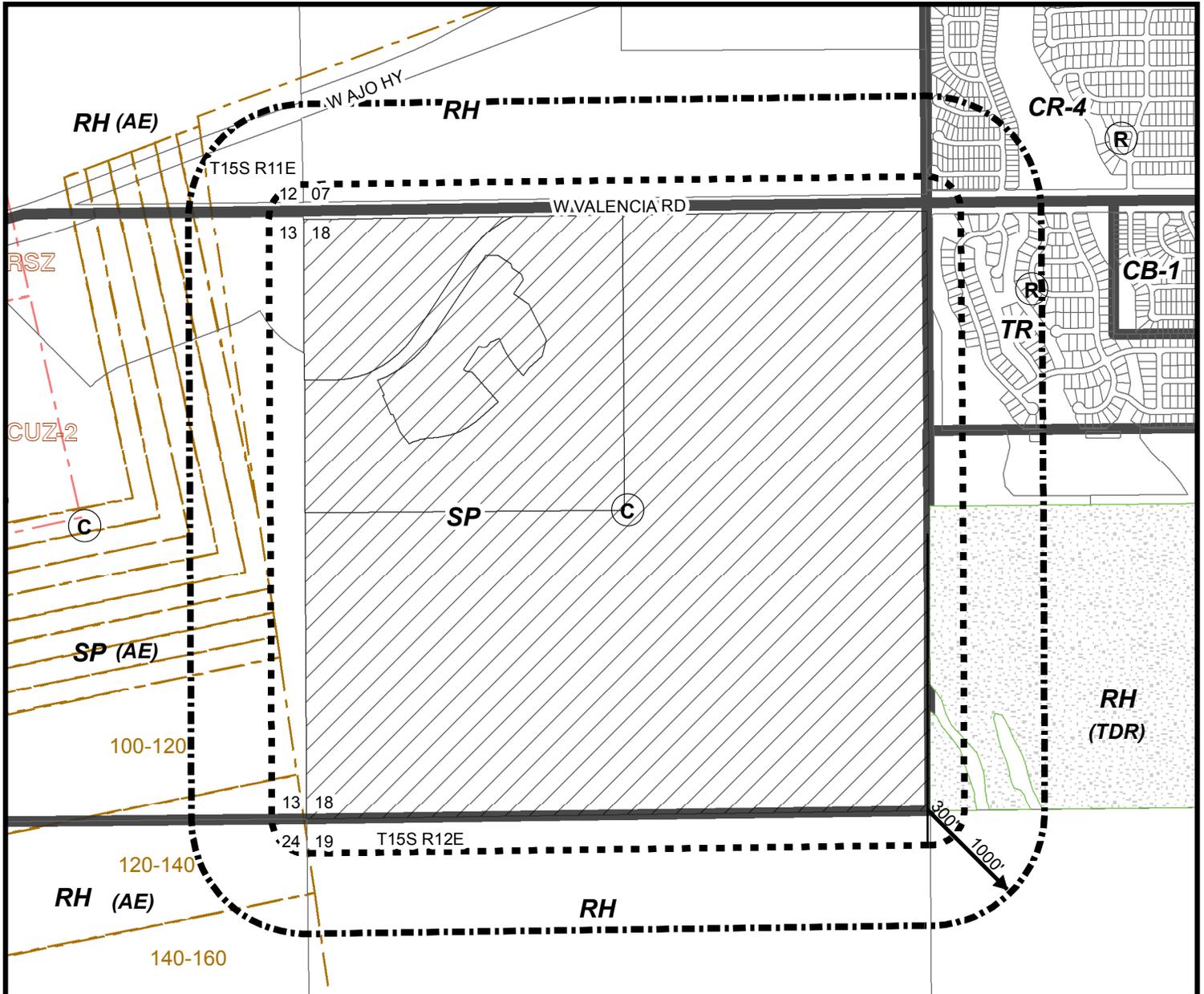
	Notes: <b>Modification (Substantial Change) of Specific Plan</b>			
	<b>PIMA COUNTY COMPREHENSIVE PLAN CO7-13-10</b>			
	Planning & Zoning Hearing: 09/28/16 (scheduled)	Board of Supervisors Hearing: 10/18/16 (scheduled)		
	Base Map(s): 65, 102	Map Scale: 1:16,000	Map Date: 08/30/16	

Case #: CO23-08-02

Case Name: POMEGRANATE FARMS SPECIFIC PLAN

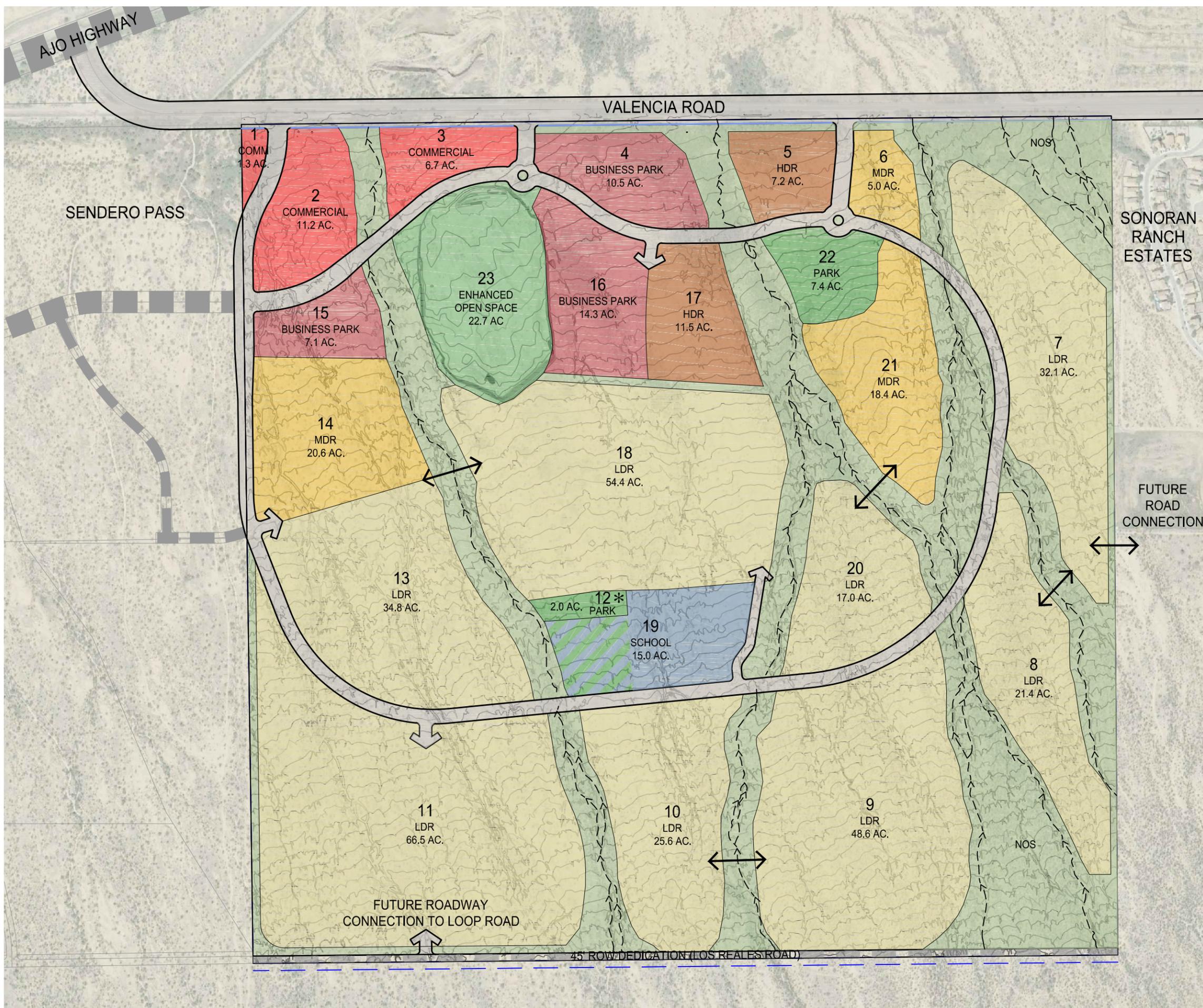
Tax Code(s): 210-40-022A, 210-40-023E, 210-40-023F, 210-40-023G

-  1000' Notification Area
-  300' Notification Area
-  Subject Property
-  Zoning Boundary



**PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT  
PLANNING DIVISION**

	Notes: <b>Modification (Substantial Change) of Specific Plan</b>			
	PIMA COUNTY COMPREHENSIVE PLAN CO7-13-10			
	Planning & Zoning Hearing: 09/28/16 (scheduled)	Board of Supervisors Hearing: 10/18/16 (scheduled)		
	Base Map(s): 65, 102	Map Scale: 1:16,000	Map Date: 08/30/16	



# POMEGRANATE FARMS

## MASTER PLAN EXHIBIT II-B

Table 3: Development Data

Parcel #	Acres	Land Use Designation	Minimum Units	Maximum Units	Maximum Density (RAC)
1	1.3	Commercial	-	-	-
2	11.2	Commercial	-	-	-
3	6.7	Commercial	-	-	-
4	10.5	Business Park	-	-	-
5	7.2	HDR	-	144	20
6	5.0	MDR	-	50	10
7	32.1	LDR	-	202	6
8	21.4	LDR	-	128	6
9	48.6	LDR	-	301	6
10	25.6	LDR	-	156	6
11	66.5	LDR	-	399	6
12	2.0	Park	-	-	-
13	34.8	LDR	-	209	6
14	20.6	MDR	-	206	10
15	7.1	Business Park	-	-	-
16	14.3	Business Park	-	-	-
17	11.5	HDR	-	229	20
18	54.4	LDR	-	347	6
19	15.0	K-8 School	-	-	-
20	17.0	LDR	-	102	6
21	18.4	MDR	-	184	10
22	7.4	Park	-	-	-
23	22.7	Enhanced OS	-	-	-
Roads	44.3	Roads	-	-	-
NOS	141.8	Natural OS	-	-	-
<b>Total</b>	<b>647.7</b>	-	<b>1,329</b>	<b>2,658</b>	-

	LDR:	Low Density Residential (6 RAC Maximum)
	MDR:	Medium Density Residential (10 RAC Maximum)
	HDR:	High Density Residential (20 RAC Maximum)
	Comm:	Commercial
	Bus. Pk.	Business Park
	School:	K-8 School Site
	Park:	Neighborhood Park
	Roads:	Arterial and Collector Street Right-of-Way
	EOS:	Enhanced Open Space
	NOS:	Natural Open Space
	5 Acres of Shared Recreation Facilities Between School and Public During Non-School Hours	

\* The location of the 2-acre private park and 5-acre joint recreational facilities is conceptual, and the final location will be determined by the Master Developer and the TUSD prior to development of the school and/or park site.

APPROX. SCALE: 1" = 600'

PRELIMINARY - NOT FOR CONSTRUCTION - COPYRIGHT LVA URBAN DESIGN STUDIO, L.L.C.

Date: 9/06/16 Project No. 1614

**LVA** urban design studio  
land planning • development entitlements • landscape architecture  
120 south ash avenue • tempe, arizona 85281 • 480.994.0994

**PSOMAS**  
333 E. Wetmore Road, Suite 450  
Tucson, AZ 85705  
(520) 292-2300 (520) 292-1290 fax  
www.psomas.com

This document, together with the concepts and designs presented herein, is intended only for the specific purpose and client for which it is prepared. Re-use of and improper reliance on this document without written authorization and adoption by LVA Urban Design Studio, L.L.C. shall be without liability to LVA Urban Design Studio, L.L.C. 10/14 POMEGRANATE FARMS/CD/PLANNING/CA 10/14-MASTER PLAN.dwg Sep 6, 2016

Staff note: The EXISTING Pomegranate Farms Specific Plan may be accessed through this link:

[http://webcms.pima.gov/UserFiles/Servers/Server\\_6/File/Government/Development%20Services/Land%20Planning%20and%20Regulation/Current%20Planning%20Tab/Pomegranate%20Farms\[1\].pdf](http://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Development%20Services/Land%20Planning%20and%20Regulation/Current%20Planning%20Tab/Pomegranate%20Farms[1].pdf)

# *Drexel Heights Fire District*

5030 S. Camino Verde, Tucson, Arizona 85735-8971  
Phone: (520) 883-4341 Fax: (520) 883-3314  
www.drexelfire.net

Board of Directors  
James Bertrand, Chair  
Cheryl Cecil, Clerk  
Gary Bynum  
Laura Dailey  
Charles Mendonca

Fire Chief  
Douglas Chappell

August 19, 2016

Development Services Department  
Planning Division  
Attn: Janet Emel  
201 North Stone, Second Floor  
Tucson, AZ 85701

RE: Pomegranate Farms      Co23-08-02

Dear Ms Emel,

Thank you for the time to review the modification request for this project. Drexel heights Fire District (DHFD) have no objections to these revisions. However, the change to have gated communities within the project must meet fire code requirements regarding electric gates.

DHFD may have additional comments to the street widths regarding parking on streets and will be addressed when the review of the street standards are done for each neighborhood. Also, DHFD is looking forward to reviewing the water plans for hydrant placement along with future commercial/Residential development in Pomegranate Farms.

Thank you and if you should have any questions regarding this letter, please feel free to contact me.

Sincerely,



Dennis Stiegleiter, Fire Marshal

August 23, 2016

Dear Ms. Emel,

Thank you for the opportunity to comment on the Pomegranate Farms Specific Plan Amendment, dated August 10, 2016. Pomegranate Farms is located south of Valencia Road, which is approximately 1000 feet southeast of the intersection of Ajo Highway (State Route 86) and Valencia Road. Pima County approved the original Pomegranate Farms Specific Plan on February 17, 2009.

The Tucson Airport Authority (TAA) has noted comments were included in the February 17, 2009 approved Specific Plan which mention the TAA Airport Disclosure Statement and the Avigation Easement as being a component of the Specific Plan. TAA recognizes the Avigation Easement for Ryan Airfield is included in Appendices 4 of the Specific Plan. TAA has an established Airport Disclosure Statement form for Ryan Airfield.

Please update the Appendix of the Specific Plan to show the attached Airport Disclosure Statement for Ryan Airfield.

TAA will provide the developer with additional details on how the Airport Disclosure Statement form and the Avigation Easement document are to be applied once the Specific Plan progresses to the Master Block Plat stage.

Please include the following comment in the Pomegranate Farms Specific Plan Amendment:

“The developer shall file Form 7460 with the FAA before beginning construction of each phase of the Pomegranate Farms Specific Plan. When filing Form 7460 please focus on the highest structure contained within the constructed phase. Any cranes used for the project must also be identified with Form 7460. Please file Form 7460 at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.”

Please do not hesitate to contact me if you have any questions or concerns regarding this comment letter. I can be reached by email at [srobidoux@flytucson.com](mailto:srobidoux@flytucson.com) or by telephone at 520-573-4811.

Respectfully,



Scott Robidoux,  
Airport Planner

cc MS  
file

**AIRPORT DISCLOSURE STATEMENT**

The undersigned purchaser(s) of a lot in the subdivision known as \_\_\_\_\_, a Pima County subdivision recorded in Book \_\_\_\_\_ at Page \_\_\_\_\_ of Maps and Plats, acknowledges that the property lies in proximity to Ryan Airfield and that the property is subject to aircraft overflight and noise that may be annoying or objectionable to some persons.

Flight patterns within 5 nautical miles of Ryan Airfield are controlled by the Federal Aviation Administration (FAA) Air Traffic Control Tower (ATCT) according to rules and guidelines for maintaining aircraft separation. The ATCT at Ryan Airfield is in operation between 6:00 am and 10:00 pm. Outside these times, approach and departure is at the pilot's discretion. According to FAA rules, except when necessary for takeoff and landing, aircraft may not fly below 1000 ft. above ground level in populated areas.

While air traffic may be generalized into tracks, it is, by nature, dispersed. Aircraft may approach and depart the airports from any number of directions. Flight paths vary depending on a variety of factors including origin/destination, wind conditions and other aircraft in the traffic pattern. As a result, any property in the vicinity of an airport is likely to be subject to aircraft overflight and its impacts to some degree.

As traffic approaches or departs an airport it is lower to the ground, more concentrated and more frequent. The area where air traffic converges as it approaches and departs the airport is represented by the FAA Traffic Pattern Airspace. This area is shown on exhibit A, attached. Lower altitudes and more frequent activity increase the perceived impacts of aircraft on the ground within this area.

The most significant impacts occur within noise contours. Noise contours depict the area where average noise exposure over a 24 hour period is considered "significant" by FAA standards. Measures such as sound insulation of structures and land use planning to exclude noise sensitive uses are required to maintain compatibility within these areas. As explained, aircraft approach and depart the airport on dispersed paths. As a result, a property that is outside established noise contours may still be impacted by the effects of periodic aircraft overflights.

Flight patterns are apt to shift or change over time. Changes in operations may occur due to weather, changes in users, changes in aircraft type, military missions, weather conditions, etc. Similarly, Ryan Airfield has a master plan that identifies plans for future expansion and development needs. These plans are updated every several years to respond to the needs of the aviation community.

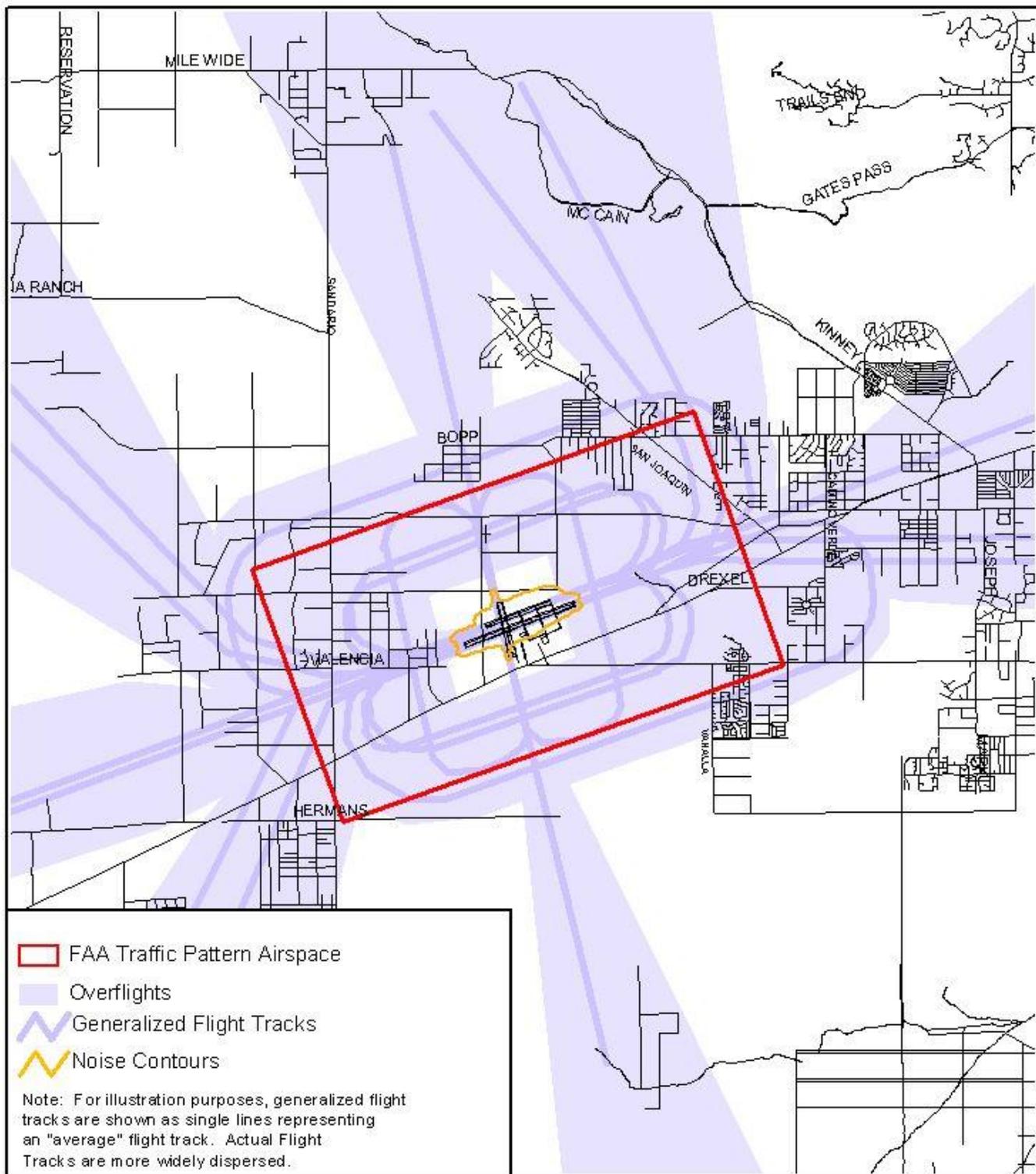
The undersigned acknowledges that the Tucson Airport Authority, the City of Tucson and all persons lawfully using the Airport have the right to operate aircraft in the airspace above and near the property and does not consider that the existence of the airport or use of the airspace above and near the property adversely affects the undersigned.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

Purchaser \_\_\_\_\_ Date

Purchaser \_\_\_\_\_ Date

# Ryan Airfield



**DECLARATION OF AVIGATION EASEMENT**

THIS DECLARATION OF AVIGATION EASEMENT ("Declaration"), is made this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_ by \_\_\_\_\_, a(n) \_\_\_\_\_ ("Declarant").

A. Declarant is the sole record owner in fee simple of certain real property (the "Property") located in Pima County, Arizona which is more particularly described in Exhibit "A" attached hereto; and

B. The Property is located in the proximity of Ryan Airfield (as it now exists or may hereafter be enlarged and/or developed, the "Airport"); and

C. The Property is now and in the future will be subject to noise and other effects emanating from aircraft operating at or departing from or arriving at the Airport, and changes in airport layout or operating procedures could result in increased noise influences.

NOW THEREFORE, for good and sufficient consideration, the receipt and adequacy of which Declarant hereby acknowledges, Declarant hereby covenants and declares that all of the Property shall be held, sold, used and conveyed subject to the following avigation easement, which shall run with the Property and be binding on all occupants thereof and on all parties having any right, title or interest in the Property or any part thereof, their heirs, successors and assigns, grantees, invitees and tenants.

DECLARANT HEREBY DECLARES, ESTABLISHES, GRANTS AND CONVEYS to the Tucson Airport Authority, the City of Tucson and all persons lawfully using the Airport the right to operate aircraft in and the right to cause in the airspace above or near the Property such noise, vibrations, fumes, vapors, smoke, deposits of dust or other particulate matter, fuel particles and all other effects as may be inherent in the operation of aircraft, now known or hereafter used, while landing on, taking off from, or operating at the Airport, as long as such operations are in compliance with applicable federal, state and local regulations concerning operation of aircraft and use of the Airport.

As used herein, the term "aircraft" shall mean any and all types of aircraft, whether not in existence or hereafter manufactured and developed, to include without limitation, jet aircraft, propeller driven aircraft, civil aircraft, military aircraft, commercial aircraft, helicopters and all types of aircraft or vehicles now in existence or hereafter developed, regardless of existing or future noise levels, for the purpose of transporting persons or property through the air.



**EXHIBIT A**

(Legal Description)

August 9, 2016

Ms. Janet Emel, Senior Planner  
Pima County Development Services Department  
201 North Stone Avenue  
Tucson, AZ 85701

**RE: Pomegranate Farms Specific Plan Amendment Request**

Please find this letter and attached materials as a formal request to amend the Pomegranate Farms Specific Plan, originally adopted by the Pima County Board of Supervisors on February 17, 2009 (Reference Case #Co23-08-02). Included with this Request Letter are the following additional submittal materials:

1. Ownership Authorization Form
2. Disclosure of Ownership Resolution
3. Specific Plan Narrative and Graphic Exhibits (PART II, III, and IV)

**PROPERTY OWNER AND DESCRIPTION**

The Pomegranate Farms property is owned by Pomegranate Farms - Tucson, LLC. The property consists of approximately 648 acres of vacant land in unincorporated Pima County, and includes the following Assessor Parcel numbers.

- APN# 210-40-022A
- APN# 210-40-023F
- APN# 210-40-023E
- APN# 210-40-023G

**PURPOSE OF REQUEST**

The Pomegranate Farms Specific Plan was originally envisioned in 2007 during the peak of the residential real-estate market as a self-sufficient, sustainable master planned community within a future growth area of Pima County. The plan was prepared based on extremely ambitious goals and development requirements related to community density and intensity of use during a time when the real estate market was

booming. Since that time, the real estate market in the Tucson region has changed dramatically, and this change has resulted in the need to amend various elements of the Specific Plan to bring it in line with today's market conditions. While the basic vision of a residentially-based, mixed use master plan community with a mix of residential, commercial, and employment uses, parks, public facilities and open space will be maintained, various provisions within the Specific Plan are being modified to align it with current market conditions. Many of the proposed changes fall within the threshold of "administrative modifications" and will be processed administratively as defined within PART IV-4 the Pomegranate Farms Specific Plan. Other modifications are considered a "Substantial or Insubstantial Changes" and will be processed in accordance with Section 18.90.080.C of the Pima County Zoning Code. There are also several "clean-up" items that have been provided to make the Specific Plan more clear and easy to understand, as well as to remove conflicts and inconsistencies within the document. The following sections summarize the Zoning Conditions to be Modified, Substantial and Insubstantial Changes, and Administrative Modifications proposed with this amendment and the justification for the changes.

#### ZONING CONDITIONS TO BE MODIFIED

- I. Condition 19 Adherence to the approved Specific Plan: This condition can be maintained as written if the Board of Supervisors approves the proposed Amendments to the Specific Plan.
- II. Condition 23 to be deleted. This is related to the requirement that all residents be within  $\frac{1}{4}$  to  $\frac{1}{2}$  mile of commercial services.
- III. Condition 24 to be modified to remove reference to the 2009 letter, and simply require owner/developer to reach agreement with the TUSD regarding the provision of a school site located within the development.

#### PROPOSED SUBSTANTIAL AND NON-SUBSTANTIAL CHANGES

- A. 50-Acres of "Floating CAC": The original Specific Plan calls for 50 acres of Floating CAC located throughout the project, with 30-acres located within the southwestern portion of the project. While the plan still incorporates 50-acres of commercial and employment uses consistent with the requirement for "50-acres of floating CAC", based on proposed modified densities and anticipated traffic patterns within the region, the Applicant proposed to cluster the commercial and employment uses along Valencia Road at the northern portion of the property. Trail connectivity will provide opportunities for pedestrian access to the commercial and employment areas from all neighborhoods within the property.
- B. Compact Development: The Specific Plan requires "compact development" with 3 to 7 story, vertically-integrated mixed land uses and urban densities. This type

of development is typically affiliated with highly urbanized areas (such as downtown) and is not viable in this location within a suburban development. There are various similar provisions within the Specific Plan affiliated with the concept of “compact development” that have been modified. This concept has been replaced with a provision for a mixed-use master plan with a mix of residential, commercial and employment uses within the development, but not compact or vertically-integrated.

C. Measurable Sustainability Standards: The Specific Plan has several specific sustainability standards that are not practical or financially feasible within a suburban master planned community such as Pomegranate Farms. While the developer does intend to require and/or encourage numerous sustainability standards, such as water conservation, promoting alternative energy use, water harvesting, recycling, pedestrian connectivity, etc., there are various elements that are proposed to be removed as requirements, as defined below:

- Remove the requirement to achieve a minimum LEED Silver Certification for all commercial and municipal buildings and neighborhood site plans, and the requirement that all residential plans will achieve a minimum LEED Silver Certification or a score of 101 points as outlined in Pima County’s Regional Residential Green Building Rating System.
- Modify the requirement to “use” municipal and commercial roof tops for solar panel installation, to “encourage the use of”.
- Modify the requirement to “provide” solar water heaters for residential buildings to “encourage the use of”.
- Remove the requirement to “Provide stub outs for grey water use for irrigation of residential homes”.
- Remove the requirement to “Establish a mechanism to collect funds from solar use, HOA dues, and voluntary transfer fees each time a residential unit is sold or resold, to be used for community programs, maintenance and to subsidize housing for educators, fire and police employees that live in the community”.
- Remove the requirement to “provide impervious surfaces for all parking areas, trails and paths to “encourage the use of” as it would be impractical to require all parking lots and paths to use impervious materials.

D. Residential Densities: The Specific Plan requires a minimum of 3,116 residential units, and a maximum of 3,810 residential units. This is based on the compact development standards and urban-style densities within portions of the project as discussed in Item B above. The applicant is proposing a more realistic, market-driven development pattern with densities that can be supported within this market area for a 648-acre master planned community. The revised densities include a maximum unit count of 2,658 and a minimum unit count of 1,329. This supports densities up to 6 RAC for LDR, 10 RAC for MDR, and 20 RAC for HDR development parcels, which provide for a much more viable density range for the proposed development.

- E. Land Use and Development Parcel Designations: The Specific Plan references all developable parcels as Districts, and used existing Pima County Zoning Districts as based land use designations for the project (such as CR-3, CR-5, TR, CB-2, and MU). However, the performance standards within the Specific Plan have no correlation to the development standards from the applicable Pima County Zoning Districts, making the reference to existing zoning districts confusing. In order to simplify and clarify the development intent, the plan has been modified to refer to all parcels as Development Parcels, and all land uses as unique designations specific for this project, including Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), Commercial (COMM), and Business Park (BP). Each of these designations has its own unique set of development standards which are similar, but more descriptive than the standards defined in the original Specific Plan. The acreage for Development Parcels has also changed based on the revised configuration.
- F. Character Sketches: The character sketches have been removed from the Specific Plan as they reference 7-story buildings and other conceptual design elements which are no longer applicable.
- G. Master Plan Exhibit and Data Table: The master plan exhibit and associated data table have been modified, including the land use designations and configuration of development parcels to reflect the revised densities and development parcels.
- H. Open Space: The definition of Open Space has been modified to include two types of Open Space, Natural Open Space (NOS), which is within the primary wash corridors, and Enhanced Open Space (EOS), which is the area within the old borrow pit near the northwest portion of the property. The EOS can provide improvements and amenities, while the NOS must remain in its natural state and left undisturbed. The overall acreage of open space has also been modified as a result of the elimination of Section 404 designated washes on the property as defined in Item #1 below under Proposed Administrative Modifications.
- I. Roadway Alignments: Roadway alignments have been modified from the original version to reflect current conditions, including:
- The internal loop road has been realigned to reflect the changes to the wash corridors and to reflect the revised development parcel configuration.
  - The north/south connection between Valencia Road and Los Reales Road near the western end of the property has been modified from its conceptual alignment to be a flexible alignment, with the precise location to be determined at the time of development of the affected parcels. This is shown on the Master Plan as a future connection road.
- J. Regulatory Development Standards: PART III, Regulatory Development Standards has been reformatted to remove discrepancies, inconsistencies, and to simplify the implementation of the development standards as the project is developed over time. The following adjustments have been made:

- Land Use Designations: The land use designations have been modified as discussed in Item #E above.
  - Permitted Uses: Simplified fragmented and conflicting permitted uses with a single table that provides permitted uses for all Land Use Designations in one location. Permitted uses are generally the same, but have been reorganized to be more clear and understandable and to remove conflicts and inconsistencies.
  - Development Standards: Simplified fragmented performance standards by District with comprehensive development standards by Land Use Designation in a simple table format. This will provide consistency, uniformity and certainty regarding required development standards throughout the development, and corrects several conflicts and inconsistencies among standards.
- K. Regulatory Design Standards: Removed the provision for Tier 1 and Tier II Design Standards into one comprehensive set of implementable Regulatory Design Standards for the Specific Plan. These incorporate a large majority of the Tier I Design Standards that were provide in the original Specific Plan, and added several new standards to reflect the intent of the Tier II standards that were to be developed in the future.

## PROPOSED ADMINISTRATIVE MODIFICATIONS

1. Section 404 Jurisdictional Washes: Since adoption of the Specific Plan, the U.S. Army Corp of Engineers (USACE) has amended the designation of Section 404 washes within the site, and has made the determination that none of the washes within the property are under the jurisdiction of the Section 404 Clean Water Act. As such, the applicant has worked with the Pima County Regional Flood Control District (PCRFCDD) to determine the major washes within the property that require preservation, and has consolidated the master plan and open space plan to reflect the requirements for wash corridors through the property. This resulted in a change to the overall open space and developable land area, and the associated development parcels within the property. This change has also resulted in a re-alignment of the internal loop road to minimize wash crossings within the property. This modification impacts several exhibits and narrative sections affiliated with the wash corridors, including total required open space and developable acreage. This potential change was contemplated within the original specific plan, and was identified as being permitted as an Administrative Modification. While this change is permitted as an Administrative Modification per the Specific Plan, several of the spin-off impacts of this change are considered Substantial Changes, and are reflected in the Substantial Change section above.
2. Valencia Road Alignment: The Valencia Road alignment has been modified from the conceptual curved alignment through the northwest portion of the property to maintain the section line alignment until it connects to Ajo Highway. This is supported by PCDOT and the adjacent Sendero pass development.

3. Riparian Habitat Restoration: The narrative within PART II-E, Biological Resources has been modified to refer to a Conservation Plan in lieu of a Riparian Habitat Restoration Plan. The Conservation Plan will satisfy Title 16, Native Plant Preservation code.
4. Bufferyards: The original Specific Plan utilized the bufferyard table within the Pima County Zoning Code. Since the revised Specific Plan establishes unique land use designations for each development parcels, and for simplicity purposes, the plan provides a bufferyard table that defines bufferyard material densities and widths per land use designation. These standards are generally consistent with the standards required within the Pima County Code, they are simply provided in table format in the Specific Plan for ease of use.
5. Parks and Trails: Park locations and trail alignments have been modified to reflect the revised master plan and wash corridors, but are in general conformance with the original plan.
6. Recreation Area Plan: The RAP projections have simply been modified to reflect the revised projected population based on density changes proposed.
7. Working Families/Affordable Housing: This section has been removed from the Specific Plan as it is an outdated standard that is no longer applicable.
8. Streetscape and Landscape: The streetscape and landscape provision per District has been replaced with a consistent theme for the entire development. The overall landscape theme and intent is in conformance with the original plan, it is simply consolidated into a single theme for the entire community.
9. Parking Standards: Removed the unique parking requirements within the original Specific Plan and conform to Section 18.75 Off-Street Parking and Loading Standards of the Pima County Zoning Code, with the exception of providing for modified parking stall sizes to slightly reduce the stall size in order to minimum impervious surface areas within the development, thereby enhancing sustainability provisions.
10. Roadway Frontage Standards: Remove special provisions for Roadway Frontage Standards and conform to Section 18.77, Roadway Frontage Standards of the Pima County Zoning Code.
11. Gated Communities: The original Specific Plan prohibited gated communities within the development. The new standard does not prohibit gated communities, but includes a requirement to maintain pedestrian connectivity throughout, which meets the intent of a pedestrian-oriented, connected community.
12. Shade for Pedestrians: The original Specific Plan required shade of at least 35% for all pedestrian areas. This is difficult to quantify, so the modified standard

requires a minimum of one shade tree every 50 feet along trails corridors and primary pedestrian areas, and a pedestrian seating area and shade element every ¼ mile to provide a comfortable refuge for pedestrians along the trail corridors.

A handwritten signature in black ink, appearing to read 'M. Reddie'.

**LVA Urban Design Studio, L.L.C**  
Mark Reddie  
Director of Planning and Entitlements

July 12, 2016

Mr. Chris Poirer  
Planning Official  
Pima County Development Services  
201 N. Stone Avenue, 2<sup>nd</sup> Floor  
Tucson, Arizona 85701

Re: Pomegranate Farms Specific Plan Modification and Amendment  
Request- Letter of Authorization

Dear Chris:

Please accept this letter of authorization from Pomegranate Farms-Tucson, LLC to designate the consulting team of Psomas, Inc. and LVA Urban Design Studio, LLC as the "Applicant" for the Pomegranate Farms Specific Plan Modification/amendment submittal, to include the Board of Supervisors Hearing Request for modifications and/or waiver of pertinent zoning conditions adopted as part of Ordinance 2009-41.

Should you have any questions, feel free to contact us.

Sincerely,



Dean Wingert  
**Pomegranate Farms – Tucson LLC**  
**c/o Crown West Land Group**

Cc: Bob Iannarino, Psomas  
Mark Reddie, LVA Design

**RESOLUTIONS OF THE SOLE MEMBER  
OF POMEGRANATE FARMS – TUCSON, LLC**

The undersigned (the "Member"), being the sole member of Pomegranate Farms – Tucson, LLC, a Delaware limited liability company (the "Company"), hereby consents to the adoption of the following resolutions, which may be relied upon by any party dealing with the Company:

RESOLVED, that Dean Wingert ("Wingert") is hereby designated as Vice President of the Company;

FURTHER RESOLVED, that the authority of Wingert, in his capacity as Vice President, to act for and bind the Company shall be limited to matters authorized in these resolutions, or in such additional resolutions as may be adopted from time to time by Company;

FURTHER RESOLVED, that Wingert, in his capacity as Vice President of the Company, be, and hereby is, authorized to negotiate, execute and deliver on behalf of the Company contracts for maintenance and repair of the Company's property and entitlement and development of the Company's property as part of a master-planned community (including, but not limited to, signing any final plats for recordation), provided that the written approval of Frank J. Walter III ("Walter"), as the Company's President, shall be required for any commitment by the Company to incur costs or liabilities in excess of \$1,000;

FURTHER RESOLVED, that any approval by Walter required under these resolutions may be given by mail, via facsimile transmission or e-mail;

FURTHER RESOLVED, that the Company shall indemnify Wingert for any liabilities incurred by him by reason of any act or omission performed or omitted by him in good faith on behalf of the Company and in a manner that he reasonably believed to be within the scope of the authority conferred on him by these or other resolutions adopted by the Company; provided that Wingert shall not be entitled to indemnity for liabilities incurred by reason of his gross negligence or willful misconduct;

FURTHER RESOLVED, that Wingert shall be entitled to rely on the Company's indemnity obligation set forth herein in the same manner and with the same effect as if such indemnity obligation were set forth in a separate written agreement duly executed by the Company; and

FURTHER RESOLVED, that no repeal, amendment or modification of the Company's indemnity obligation set forth herein shall be effective unless written notice thereof is delivered to Wingert, nor shall any such repeal, amendment or modification eliminate or reduce the Company's indemnity obligation with respect to any matter that occurred prior to written notice of such repeal, amendment or modification.

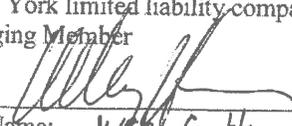
DATED as of March 18, 2014.

MEMBER:

Petrus Land Investors II, L.P.,  
a Delaware limited partnership

By: Petrus-Crown GP Land II, L.L.C.,  
a Delaware limited liability company,  
General Partner

By: Crown West Realty, L.L.C.,  
a New York limited liability company,  
Managing Member

By:   
Print Name: Wesley C. Flinn  
Title: Managing Director

APPROVED AND ACCEPTED:

  
Dean Wingert







## Pima County Geographic Information Systems

### Parcel 210-40-023F

Read the [Disclaimer](#). Information on this page is **unofficial**.

#### Mail name and address

210-40-023F  
 POMEGRANAT FARMS COMMERCIAL TUCSON LLC  
 3808 N SULLIVAN RD STE 202  
 BLDG N15  
 SPOKANE VALLEY WA 99216-1608

#### Legal description

PTN S1401' N1476' W1765.61' NW4 36.59 AC  
 SEC 18-15-12

#### Situs (property) address

([About situs addresses](#))

Street Address	Jurisdiction	Postal City	Zip Code
9393 W VALENCIA RD	PIMA COUNTY	TUCSON	85757

[ZIP+4 Lookup](#)

#### Information for this parcel

- For **Assessor parcel details**, copy and paste Parcel ID **21040023F** into the [Pima County Assessor's "Quick Search"](#). We cannot link directly. Also see [Assessor Record Maps](#).
- [Real Estate Property Tax Inquiry](#) and [Property Tax Statement](#) from the [Pima County Treasurers's Office](#).
- **Recorded Information** from the [Pima County Recorder's Office](#)
  - [Recorded Document](#) for Sequence Number 20051791174.
  - [Voter Precinct and Districts](#)
- A **Subdivision Plat Map** is not available here because the GIS parcel record does not have subdivision Book/Page or Sequence numbers. The parcel may have an associated subdivision Book/Page or Sequence number that isn't documented here. See "Subdivision" in the ["Development" GIS overlay details group](#) results. As another option, the parcel legal description above may have a subdivision name you can search for in [Subdivision Final Plats](#).
- Pima County [Sanitary Sewer Connection Search](#) and [Connection Records Overview](#).
- **Permits** from [Pima County Development Services](#).
  - [Permit Database Search](#)
  - [Historical Permit Cards](#) - Prior to about 1998
- City of Tucson Development Activity Records are not available because the parcel is not in the City of Tucson.
- [Section Information and Maps](#) for Township 15S, Range 12E, Section 18. This parcel's GIS [overlay details Grids group](#) is a **more complete analysis** of sections when parcel boundaries extend outside of the listed section.



## Pima County Geographic Information Systems

### Parcel 210-40-023G

Read the [Disclaimer](#). Information on this page is **unofficial**.

#### Mail name and address

210-40-023G  
POMEGRANAT FARMS COMMERCIAL TUCSON LLC

3808 N SULLIVAN RD STE 202  
BLDG N15  
SPOKANE VALLEY WA 99216-1608

#### Legal description

IRR PCL CTRL PTN NW4 25.27 AC SEC 18-15-12

#### Situs (property) address

[\(About situs addresses\)](#)

Street Address	Jurisdiction	Postal City	Zip Code
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There is no situs address information.

#### Information for this parcel

- For **Assessor parcel details**, copy and paste Parcel ID **21040023G** into the [Pima County Assessor's "Quick Search"](#). We cannot link directly. Also see [Assessor Record Maps](#).
- [Real Estate Property Tax Inquiry](#) and [Property Tax Statement](#) from the [Pima County Treasurers's Office](#).
- **Recorded Information** from the [Pima County Recorder's Office](#)
  - [Recorded Document](#) for Sequence Number 20071770220.
  - **Voter Precinct and Districts** are not available because there is no parcel situs address information.
- A **Subdivision Plat Map** is not available here because the GIS parcel record does not have subdivision Book/Page or Sequence numbers. The parcel may have an associated subdivision Book/Page or Sequence number that isn't documented here. See "Subdivision" in the "[Development](#)" [GIS overlay details group](#) results. As another option, the parcel legal description above may have a subdivision name you can search for in [Subdivision Final Plats](#).
- [Pima County Sanitary Sewer Connection Search](#) and [Connection Records Overview](#).
- **Permits** from [Pima County Development Services](#).
  - [Permit Database Search](#)
  - [Historical Permit Cards](#) - Prior to about 1998
- City of Tucson Development Activity Records are not available because there is no parcel situs address information.
- [Section Information and Maps](#) for Township 15S, Range 12E, Section 18. This parcel's [GIS overlay details Grids group](#) is a **more complete analysis** of sections when parcel boundaries extend outside of the listed section.



4. Recording of the necessary development related covenants as determined appropriate by the various County agencies.
5. Provision of development related assurances as required by the appropriate agencies.
6. Prior to the preparation of the development related covenants and any required dedication, a title report (current to within 60 days) evidencing ownership of the property shall be submitted to the Development Services Department, Document Services.
7. There shall be no subdividing or lot splitting without the written approval of the Board of Supervisors.
8. In the event of a conflict between two or more requirements in this specific plan, or conflicts between the requirements of this specific plan and another Pima County regulation not listed in Section 18.90.050B3, the more restrictive requirement shall apply.
9. This specific plan shall adhere to all applicable Pima County regulations that are not explicitly addressed within this specific plan. The specific plan's design standards shall be interpreted to implement the specific plan or relevant Pima County regulations.
10. Prior to the issuance of any permits, this specific plan is subject to the approval of a Master Subdivision Block Plat for the entire site. The subdivision block plat shall make all dedications (including roads, sewer, drainage, trails and open space), unless otherwise specified in the development agreement, and the plat shall identify all necessary improvements and provide a design and construction phasing plan. Upon submittal of the block plat, the studies, reports, information required by these specific plan conditions and the specific plan document itself, shall be provided for review and approval of the applicable Pima County department or departments. Subsequent site development requires submittal of subdivision plats or development plans prepared in accordance with the subdivision block plat.
11. No building permits shall be issued until all applicable specific plan requirements for or affecting the site are satisfied and the Planning Director issues a Certificate of Rezoning Compliance.
12. Transportation Department requirements:
  - A. The property owner/developer(s) shall dedicate 200 feet full right-of-way, or 100 feet half right-of-way as applicable, for Valencia Road as designated by



F. Minimum separation between driveways and streets shall be 600 feet along Valencia Road, Los Reales Road and Desert Sunrise Trails. All access shall require Department of Transportation approval.

G. Provision of access from the internal loop road to the southeast boundary of the specific plan to provide future access to undeveloped property to the east.

H. Provision of a detailed and up to date Traffic Impact Study shall be submitted with the Master Block Plat and shall be updated as determined necessary by Department of Transportation throughout the development of the specific plan.

I. Two Park & Ride facilities shall be provided for within the specific plan, one within the town center or commercial uses along Valencia Road and one along Los Reales Road. The property owner/developer(s) shall provide a study/report that addresses transit issues for the specific plan and how it interrelates within the southwest area.

J. Each district shall be designed to establish coordinated pedestrian and transit oriented connections within the specific plan and plan for future connections beyond the limits of the specific plan.

13. Regional Flood Control District requirements:

A. Drainage improvements required to remove the developable portions of the site from the FEMA floodplain will be identified in a drainage report to be finalized with the Master Block Plat. Approval of the Drainage Report and CLOMR shall be required prior to recordation of the block plat and approval of the Certificate of Compliance. Approval of the LOMR is required prior to issuance of any building permits.

B. Drainage corridors identified in the Specific Plan are to be enhanced to provide riparian habitat connectivity across the site as well as recreational and aesthetic amenity to the residents. If a riparian mitigation plan is required, it shall be submitted for approval with the Block Plat and prior to the Certificate of Compliance in order to ensure sustainability principles identified by the County and Specific Plan are implemented.

C. Drainage improvements shall be designed in coordination with Ajo Highway and neighboring developments.

D. Due to the proposed land use intensities and severe flood and erosion hazards, flood control improvements shall be constructed with concrete, gunite, soil cement, or other structural methods. Earthen channels shall not be allowed.

14. Wastewater Reclamation Department requirements:

A. The owner / developer shall construe no action by Pima County as a commitment to provide sewer service to any new development within the rezoning area until Pima County executes an agreement with the owner / developer to that effect.

B. The owner / developer shall obtain written documentation from the PCRWRD that treatment and conveyance capacity is available for any new development within the rezoning area, no more than 90 days before submitting any tentative plat, development plan, sewer improvement plan or request for building permit for review. Should treatment and / or conveyance capacity not be available at that time, the owner / developer shall have the option of funding, designing and constructing the necessary improvements to Pima County's public sewerage system at his or her sole expense or cooperatively with other affected parties. All such improvements shall be designed and constructed as directed by the PCRWRD.

15. Natural Resources, Parks and Recreation Department requirements:

A. Prior to the release of assurances for the 1,038<sup>th</sup> lot (30% of the lots), the approximate seven-acre park and all associated and required recreation elements shall be constructed.

B. Prior to the release of assurances for the lots greater than 75% of the total lots within each district as shown on the Phasing Plan (Exhibit IV-A.6), recreation elements and trail locations shall be built as conceptually shown on Exhibit II-M within that district.

C. The 10-foot shared-use path and eight-foot stabilized trail within the residential collector road shall be constructed by the developer and maintained by a Homeowners Association.

D. A Homeowners Association shall maintain all shared-use paths and stabilized trails throughout the development.

E. Final determination of recreation areas and elements required shall be determined with a Recreation Area Plan (RAP), which shall be submitted and approved prior to the approval of the tentative plat. A RAP shall be submitted for each district. Each district shall meet the recreation requirements as stated in Section 18.69.090 and the Recreation Area Design Manual.



Revised Statutes Title 12, chapter 8, article 2.1). To the extent that the rezoning or conditions of rezoning may be construed to give Property Owner any rights or claims under the Private Property Rights Protection Act, Property Owner hereby waives any and all such rights and/or claims pursuant to A.R.S. § 12-1134(I)."

19. Adherence to the specific plan document as approved at the Board of Supervisor's public hearing.
20. If required by the Drexel Heights Fire District (District), the developer shall provide a fire station site within the project that is compatible with adjacent land use and acceptable to the developer and the District and to be shown on the applicable subdivision plat or development plan. The developer shall provide for the transfer of that property to the District.
21. The developers shall include disclosure statements regarding Ryan Airfield in all sales contracts, public reports, and the recorded covenants. The developers shall also establish avigation easements relative to Ryan Airfield. The specific language for inclusion in the disclosure statements and the enactment of the avigation easements shall be coordinated with the Tucson Airport Authority. Land use restrictions shall be coordinated with Ryan Airfield operations to ensure compatibility of proposed land uses with current and projected future airport operations.
22. At a minimum, the majority of infrastructure and transportation costs shall be self-funded by the developer, including but not limited to impact fees. A development agreement to address, at minimum, infrastructure commitments, phasing, and funding shall be developed and approved by the Board of Supervisors prior to submittal of a Master Block Plat. No permits shall be issued until the revisions to the Pima County development impact fee program are adopted by the Board of Supervisors.
23. Any proposal or action which would result in a significant deviation from the objective of providing or reserving the necessary acreage for commercial services within  $\frac{1}{4}$  -  $\frac{1}{2}$  mile of all residential development (as stated in the specific plan) or the general dispersal of commercial services to serve the residential development of the specific plan, would be considered a "Substantial Modification" of the specific plan requiring public hearings before the Planning and Zoning Commission and the Board of Supervisors per Section 18.90.080.
24. Owner/Developer shall reach an agreement with Tucson Unified School District (TUSD) or another public school provider regarding the provision of a school location within the development as shown and described in the specific Plan. TUSD and Owner/Developer have begun negotiations. If the agreement is with





Exhibit B is the Pomegranate Farms Specific Plan document approved by the Pima County Board of Supervisors on February 17, 2009.

The document is not recorded but may be viewed at the office of the Pima County Development Services Department, Planning Division, at the following address:

County-City Public Works Building  
201 N. Stone Avenue, 2<sup>nd</sup> Floor  
Tucson, Arizona

Exhibit C

Legal Description

Parcel 210-40-022A – NE4 EXC N75' THEREOF & S2 482.14 AC SEC 18-15-12

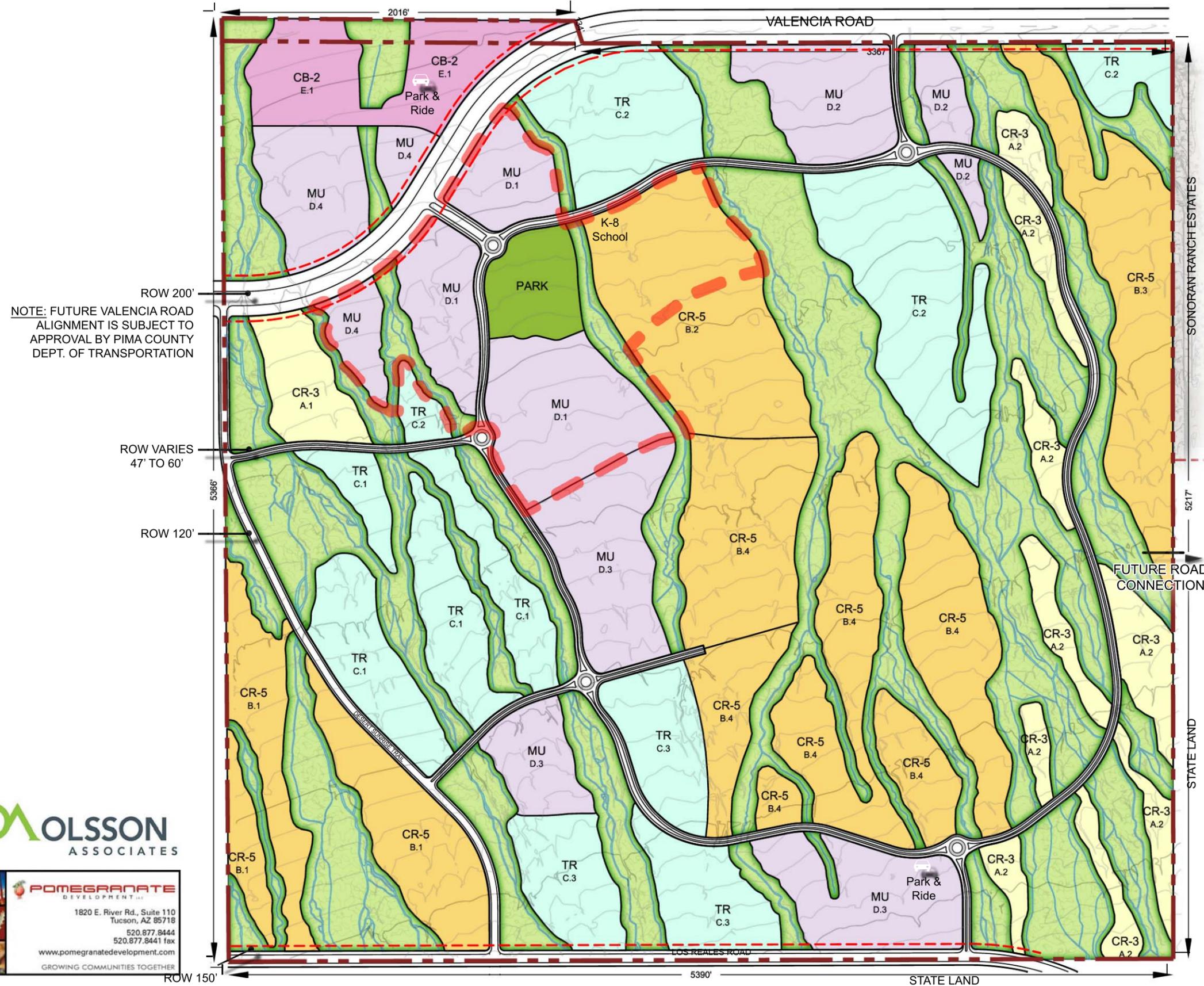
Parcel 210-40-023F – PTN S1401' N1476' W1765.61' NW4 36.59 AC SEC 18-15-12

Parcel 210-40-023E – PTN NW4 100.93 AC SEC 18-15-12

Parcel 210-40-023G – CTRL PTN NW4 25.27 AC SEC 18-15-12

# POMEGRANATE FARMS

EXISTING SPECIFIC PLAN



NOTE: FUTURE VALENCIA ROAD ALIGNMENT IS SUBJECT TO APPROVAL BY PIMA COUNTY DEPT. OF TRANSPORTATION

## LEGEND

DISTRICT	ACREAGE	MIN. DENSITY (DU)	MIN. TARGET DENSITY	TARGET DENSITY (DU)	MAX TARGET DENSITY	MAX. DENSITY (DU)
<b>SP CR-3 Single Residence</b>						
A.1	9.1	36	66	73	80	91
A.2	26.0	104	187	208	229	260
<b>Totals</b>	<b>35.1</b>	<b>140</b>	<b>253</b>	<b>281</b>	<b>309</b>	<b>351</b>
<b>SP CR-5 Multiple Residence</b>						
B.1	27.7	111	199	222	244	277
B.2	29.6	38	213	237	260	296
B.3	27.4	110	197	219	241	274
B.4	66.5	266	479	532	585	665
<b>Totals</b>	<b>151.2</b>	<b>525</b>	<b>1089</b>	<b>1210</b>	<b>1331</b>	<b>1512</b>
<b>SP TR Transitional</b>						
C.1	32.1	385	404	449	494	642
C.2	46.5	558	586	651	716	930
C.3	27.7	332	349	388	427	554
<b>Totals</b>	<b>106.3</b>	<b>1276</b>	<b>1339</b>	<b>1488</b>	<b>1637</b>	<b>2126</b>
<b>SP MU Multiple Use</b>						
D.1	17.1	68	154	171	188	205
D.1 COMMERCIAL	13.8	-	-	-	-	-
D.2	9.6	38	86	96	106	115
D.2 COMMERCIAL	6.5	-	-	-	-	-
D.3	18.0	72	162	180	198	216
D.3 COMMERCIAL	17.4	-	-	-	-	-
D.4	3.7	15	33	37	34	44
D.4 COMMERCIAL	12.3	-	-	-	-	-
<b>Totals</b>	<b>98.4</b>	<b>179</b>	<b>436</b>	<b>484</b>	<b>526</b>	<b>536</b>
<b>SP CB-2 General Business</b>						
E.1	16.0	-	-	-	-	-
<b>TOTAL</b>	<b>407.0</b>		<b>3116</b>	<b>3463</b>	<b>3810</b>	<b>4525</b>

## TOTALS

DISTRICTS	407	NOTE 1
OPEN SPACE	201	NOTE 2
RIGHT-OF-WAY	37	NOTE 2
<b>TOTAL</b>	<b>645</b>	

NOTE 1: Dwelling unit total rounded to accommodate fractionalized acreage.  
 NOTE 2: Final acreage of Specific Plan elements to be determined by Final Plat of record.  
 NOTE 3: To achieve maximum DU (4,525) requires Board of Supervisors approval.

- Jurisdictional Washes
- Town Center
- 30' MS&R Set-back

**OLSSON ASSOCIATES**

**POMEGRANATE DEVELOPMENT**  
 1820 E. River Rd., Suite 110  
 Tucson, AZ 85718  
 520.877.8444  
 520.877.8441 fax  
 www.pomegranatedevelopment.com  
 GROWING COMMUNITIES TOGETHER

## EXHIBIT II-B MASTER PLAN

