



Coalition for Sonoran Desert Protection

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July 26, 2021

Arizona Center for Law
in the Public Interest
Arizona Native Plant
Society
Bat Conservation
International
Cascabel Conservation
Association
Center for Biological
Diversity
Center for Environmental
Ethics
Defenders of Wildlife
Desert Watch
Environmental Law
Society
Friends of Cabeza Prieta
Friends of Ironwood Forest
Friends of Madera Canyon
Friends of Saguaro
National Park
Friends of Tortolita
Gates Pass Area
Neighborhood
Association
Genius Loci Foundation
Great Old Broads for
Wilderness— Tucson
Native Seeds / SEARCH
Protect Land and
Neighborhoods
Safford Peak Watershed
Education Team
Save the Scenic Santa Ritas
Sierra Club – Grand
Canyon Chapter
Sierra Club – Rincon Group
Sky Island Alliance
Southwestern Biological
Institute
Tortolita Alliance
Tucson Audubon Society
Tucson Herpetological
Society
Tucson Mountains
Association
Wildlands Network

Ms. Terri Tillman, Senior Planner
Pima County Planning
Tucson, Arizona 85701

RE: P21SP00001, Cortaro 57 Specific Plan

Dear Ms. Tillman:

We write today about the proposed Cortaro 57 Specific Plan, a group of parcels on both the east and west side of the Camino de Oeste alignment, immediately on the south side of Cortaro Road. While we continue to work with the property owner's representatives, we would like to share our concerns with you at this point in the process. While we hope to come to a point where we can support this proposal, identifying issues with staff and the property owner now will hopefully move us in that direction.

These parcels fall under a guideline of 80% preservation or 4:1 mitigation. The Coalition has supported the on and/or offsite combination conservation guideline since it was adopted into the Comprehensive Plan because we have always considered off-site mitigation as an appropriate supplement to on-site preservation. Until we began to review this proposal, this is how it has worked with the parcels that have come to us for consultation. This proposal falls far short of the conservation goal for these parcels. Within these parcels, approximately 52.9 acres are designated as a Special Species Management Area. Yet, according to the developer, only “~8.5%” of the property is proposed for preservation, all of which must already occur in the regulated floodplain. Additionally, a development of such a biologically rich old growth upland saguaro and ironwood tree habitat should preserve more functionally mature plants on place under the County's Native Plant Preservation Ordinance.

There are multiple issues to be considered in addressing this proposed mass-graded development, including:

- The majority of the property – all but ~2 acres - is classified under the Comprehensive Plan as Conservation Lands System Multiple Use Management Area (MUMA) and Special Species Management Area (SSMA). The Natural Undisturbed Open Space conservation guideline for the SSMA overlay is 80% on-site and/or 4:1 off-site mitigation.

- The entirety of the land being considered for up zoning has been designated as “High Priority Private Habitat Protection Priority” which signifies that the land is of high biological importance for protection in perpetuity.
- Two parcels totaling 20 acres immediately adjacent to the southwest of the parcel were acquired by Pima County as mitigation for habitat destruction to Thornydale Road. These parcels are classified as “Restricted Conservation Lands” and are subject to a Restrictive Covenant as federal Section 7/Section 10 mitigation parcels.
- This property’s value to wildlife connectivity reflects not only its designation as an acquisition target but also its location in the landscape. The property immediately connects to the County-owned mitigation parcels to the southwest and, via SR zoned vacant land to the north and northeast, to the Regional Flood Control-owned Hardy Wash and County-owned Maeveen Marie Behan Desert Sanctuary in Arthur Pack Park and beyond to other County-owned preserve and/or mitigation lands. Please see the attached map for a visual representation of the important wildlife connectivity across the landscape.
- The largest of the two on-site regulated washes contains a designated wildlife crossing structure culvert under Cortaro Farms Road to accommodate meso-carnivores such as coyote, fox, javelina and bobcats as well as smaller species. The Pima County Department of Transportation also placed wildlife fencing along the northern side of Cortaro Farms Road to safely funnel wildlife through the regulated floodplain and adjacent Erosion Hazard Setback (EHS) buffer and prevent wildlife/vehicle collisions. To the best of our knowledge, this is the only wildlife crossing structure in the region south of Tangerine Road, except for some of the recent road improvements along La Cholla, north of Overton, and the work done along Twin Peaks in Marana.

Below are our recommendations to improve this proposal:

- Most importantly, this development shall provide significantly more on-site preservation of Natural Undisturbed Open Space as common area, as well as more permeability for wildlife throughout the site. While we support Pima County’s adopted NPPO and off-site mitigation options in concept as supplementing on-site preservation, we believe that this proposal falls short of both.
- Development shall not occur in the floodplain and structures are not allowed in the EHS buffer zone. Because of the regulatory wash and wildlife corridor transecting the proposed development, there should be no trails located within the floodplain or the EHS zone. Signage shall be posted to prohibit humans and pets from entering the area for their own safety and the safety of the raptors and other birds, snakes, herps, small mammals such as

badger, spotted skunk, rock squirrels, Harris's antelope squirrels, etc. and meso-carnivores that live in and migrate through the neighborhood.

- Wildlife fencing, identical to that used by Pima County along the north side of Cortaro Farms Road, shall be installed wherever there is not a six-foot masonry wall along Cortaro and Camino de Oeste and cattleguards shall be installed at all entrances/exits along Cortaro Farms Road and Camino de Oeste to discourage wildlife/vehicle collisions.
- With topo base map, the hill-shaded relief map* color shows the ridges they would level and, when looking at the newer, permeable Willow Vista development immediately to the west, it would be a natural progression to instead build in a similar configuration on the ridges, preserving the interbraided wash system.
- The drainage easement and EHS buffer along the southern boundary of the proposed development, owned by Pima County, east of the Camino de Oeste alignment, and the drainage parcels west of the alignment, owned by the Remington HOA, adjacent to Pima County's two Section 7/10 mitigation parcels, as well as the parcels owned by the Willow Vista HOA, contribute to, but are not sufficient for wildlife adequate permeability when considered alone. They and any applicable EHS buffer shall not be infringed upon in any way.

*As a note to County staff, we reported the lack of complete topographic and wash data layers east of the Camino de Oeste alignment within the proposed development per Pima Maps to the RFCD but that has yet to be rectified as of 7/21/2021.

Thank you for considering our concerns and comments. We will continue to work with the property owner to develop a proposal that is more suited to the biological values of this parcel and that more closely aligns with the spirit of the CLS guidelines and the NPPO.

Sincerely,

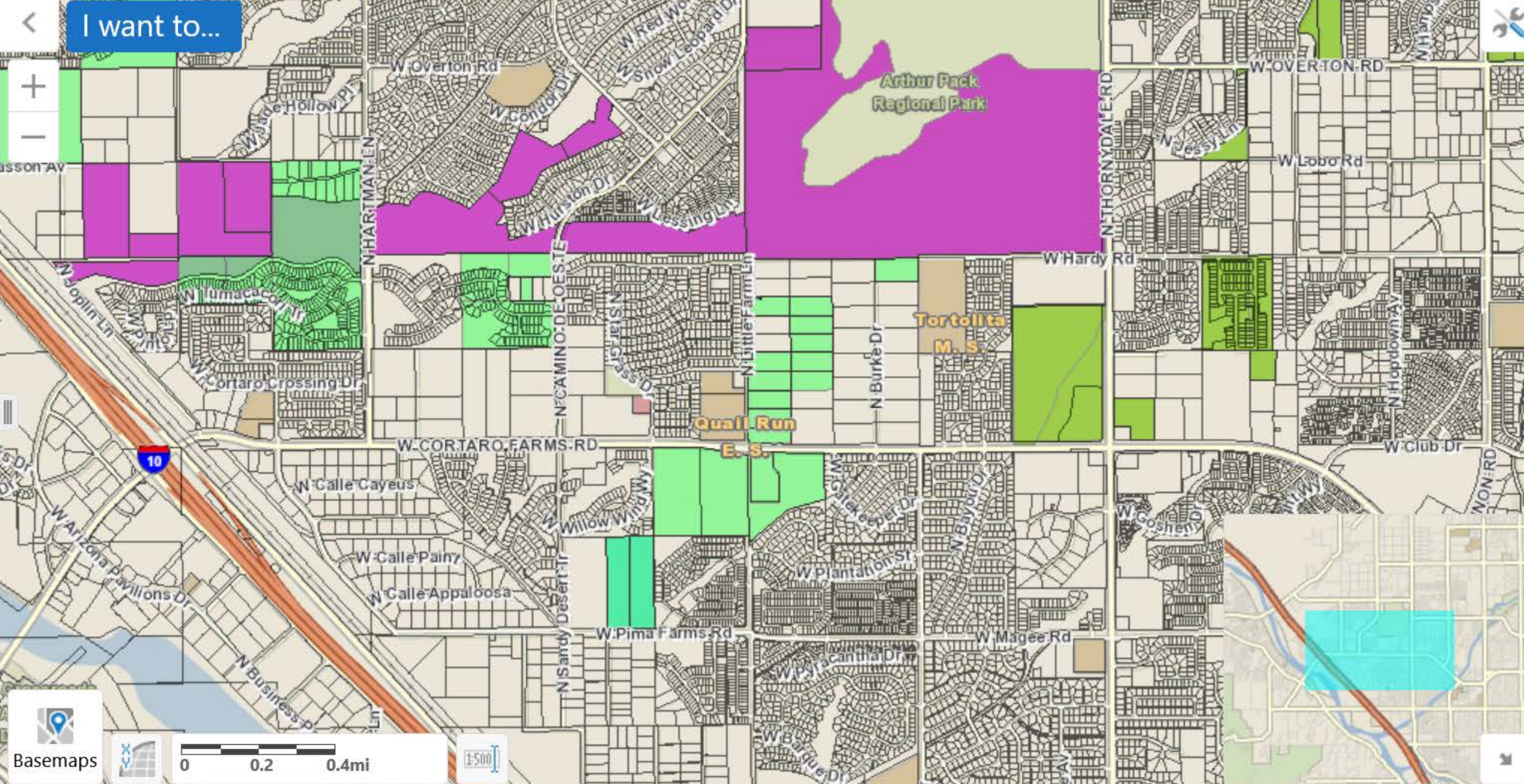


Carolyn Campbell
Executive Director

Cc: Chris Poirier, Deputy Director/Planning Official
Sherry Ruther, Deputy Director, Office of Sustainability & Conservation

Attachment (1)

I want to...



Basemaps



1:500