



# Coalition for Sonoran Desert Protection

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- Arizona Center for Law in the Public Interest
- Arizona Master Naturalist Association
- Arizona Native Plant Society
- Bat Conservation
- Cascabel Conservation Association
- Center for Biological Diversity
- Center for Environmental Ethics
- Defenders of Wildlife
- Desert Watch
- Environmental Law Society
- 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
- Save the Scenic Santa Ritas
- Sierra Club - Grand Canyon Chapter
- Sierra Club - Nopales Group
- Sky Island Alliance
- Tortolita Alliance
- Tortolita Homeowners Association
- Tucson Audubon Society
- Tucson Herpetological Society
- Tucson Mountains Association
- Wildlands Network

January 31, 2025

Cesar Acosta  
Planning Department  
201 N Stone Ave  
Tucson, AZ 85701

Dear Cesar,

The following recommendations respond to the preliminary draft of the City of Tucson’s 10-year general plan, *Plan Tucson 2025*, and its goals, narratives and policies. These recommendations are informed by our 26+ years of experience of protecting the Sonoran Desert in partnership with the City of Tucson and its neighboring jurisdictions.

The Coalition for Sonoran Desert Protection is concerned that the preliminary draft does not adequately appreciate or incorporate the City of Tucson’s natural heritage—including its undisturbed natural open space and its biological diversity or biodiversity, which are critical to the City’s equity, extreme heat and climate, environmental, water, and economic goals.

We note that, in the entire document’s main text, ‘natural open space’ was used only once and ‘biodiversity’ was not used at all. We have made a number of suggestions to clarify tools such as undisturbed natural open space, wildlife corridors and wildlife crossings and the City’s role in using such tools to preserve and protect our landscape and its biodiversity.

We strongly advise that the City adopts in full Pima County’s Conservation Lands System or CLS. The CLS is a tool that will allow the City of Tucson to align with other regional jurisdictions and to make significant, tangible and long-lasting progress in preserving its highest-value land from a biological perspective. This includes land around the Santa Cruz River, Pantano Wash, Rillito River and Tanque Verde Creek as well as areas of the Tucson Mountain Foothills—lands

that, throughout the narrative and under several of the preliminary draft's policies, you already commend for their value and note should be preserved.

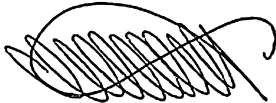
Living with urban wildlife is another key element that must be addressed—this includes ensuring that recreation is environmentally sensitive (and so does not impose on the City's natural undisturbed open space), that residents are educated on living in harmony with urban wildlife, and that we support wildlife corridors with appropriate wildlife crossing infrastructure.

The Coalition for Sonoran Desert Protection cannot support the preliminary draft as it is written but we look forward to engaging with you on our recommended improvements.

Thank you for the opportunity to comment and please let us know if you have any questions. Note that CSDP will also submit these recommendations via the online survey.

Sincerely,

Kate Hotten

A handwritten signature in black ink, appearing to read 'Kate Hotten', with a large, stylized flourish extending to the right.

Co-Executive Director

## Recommendations

The following recommendations respond to the preliminary draft of the City of Tucson’s 10-year general plan, *Plan Tucson 2025*, and its goals, narratives and policies, and are formatted to correspond with the online survey format.

### Goal 3: Be a Leader in Carbon Reduction and Resiliency to Extreme Heat and Climate Impacts.

**Recommendation 1:** Incorporate additional policies that more thoroughly reflect the critical role of green space and natural open space (as mentioned on pg. 74 of the draft), including riparian areas, in the City of Tucson’s approach to carbon reduction and resiliency to extreme heat and climate impacts.

- The City of Tucson’s own Climate Action and Adaptation Plan, *Tucson Resilient Together*, makes several recommendations that require investment in the City’s green space and natural open space, including riparian areas. This includes recommendations made in its policies RR.5 and CR.3 on green infrastructure and nature-based solutions.
- Specifically, add:
  - **Ecosystems 6** Expand and maintain a healthy, drought-tolerant, low-water-use tree canopy and urban forest that utilizes harvested water to provide Sonoran Desert ecosystem services, mitigate the urban heat island, and improve the microclimates of neighborhoods and the City as a whole. (See [Recommendation 36](#))
  - **Ecosystems 7** Preserve, restore and enhance riparian areas, shallow groundwater-dependent ecosystems, arroyos, creeks, and river ecosystems as natural open space with multiple benefits, including wildlife habitats, climate adaptation, and stormwater management. (See [Recommendation 7](#)).
  - **Land Use 20** Apply Pima County Conservation Lands System map and associated guidelines in entitlement reviews. (See [Recommendation 29](#)).

### Goal 3 Narrative

**Recommendation 2:** Update *Fig. 3.4.2. Parks and Recreation Assets*—technically, many of the figure’s categories are considered Open Space under *Plan Tucson’s* definition, but there is also a category for open space. Update the ‘Open Space’ category in the legend to ‘Other Open Space’.

## Goal 4 Narrative

**Recommendation 3:** Update the second paragraph to reference benefits of engaging with the outdoors, one's environment, and community, which are critical to public parks: '...where residents can engage in physical activity, pursue active lifestyles and connect with nature and each other.'

### Goal 4, Wellness 8: Acquire properties to ensure connected services and a 10-minute walk to park space.

**Recommendation 4:** The quality of park space is important. Update Wellness 8 to specify '...walk to quality park space'. The Coalition maintains that quality park space includes native plants and other elements critical for biodiversity and climate adaptation. We also note that the term 'biodiversity' is not used once in the current 331-page City of Tucson Parks and Recreation Master Plan, and that references to native plants are also limited in that plan.

### Goal 4, Ecosystems 2: Enhance the quality and quantity of open space, prioritizing areas of disinvestment.

**Recommendation 5:** Specify green space by replacing the first clause with 'Enhance the quality and quantity of green space,...'.

- The current definition of open space includes green space but is not limited to it, and does not capture broader green infrastructure. As a result, this policy must specify green space in order to be effective in a climate, wellness and ecosystem context.

### Goal 4 and Goal 8, Environment 2: Address pollution to reduce the cumulative negative impacts on the health of communities.

**Recommendation 6:** Update to '...pollution and pollutants to reduce the...'

**Goal 7 and Goal 9, Ecosystems 7:** Preserve, restore, and enhance riparian areas, shallow groundwater-dependent ecosystems, arroyos, creeks, and river ecosystems for multiple benefits, including wildlife habitat, environmentally sensitive recreation, and stormwater management.

**Recommendation 7:** Remove ‘environmentally sensitive recreation’, which conflicts with aims to preserve, restore or enhance, and add ‘climate adaptation’. The City’s waterways are a critical component of its Climate Action and Adaptation Plan. Also, specify that these are to be considered natural open spaces, as defined.

- Specifically, update to ‘Preserve, restore and enhance riparian areas, shallow groundwater-dependent ecosystems, arroyos, creeks, and river ecosystems as natural open space with multiple benefits, including wildlife habitats, climate adaptation, and stormwater management’. See [Recommendation 33](#) on the definition of natural open space.

**Recommendation 8:** Introduce a new Environment (and *not* Ecosystems) policy that addresses environmentally sensitive recreation, as removed from Ecosystems 7 under our recommendation. We suggest language similar to that used in the preliminary draft of Pima County’s Comprehensive Plan, *Pima Prospers*:

- Policy e): Establish, refine and maintain policies and protocols governing the use of and access to these lands, including development of strategic/master plans for open space management and public use and cultural heritage
- Policy f): Connect people to nature by promoting nature-based recreation, environmental education, and natural and cultural resources stewardship through public nature walks and hikes, birding and other wildlife watching, K-12 field-study programs, presentations, publications and signage, engagement in community science data collection, and invasive species monitoring and removal projects

## Goal 8 Narrative

**Recommendation 9:** Update the reference to ‘Dark Skies Ordinance’ on pg. 114 to ‘Outdoor Lighting Code’ (see [Recommendation 31](#)).

**Recommendation 10:** Update the ‘Light Pollution’ paragraph on pg. 122 to reference environmental aspects.

- Specifically, add ‘Light pollution also impacts our landscape and its living species, with migration, navigation and foraging behavior negatively affected’ after ‘When lighting is poorly planned and designed, it can obliterate the ability to view the night skies.’
- Also add after the last sentence that, ‘This is also important for our environment, another major generator of tourism revenue.’

**Goal 8, Environment 1: Reduce and mitigate air, water, and noise pollution in neighborhoods, along roadways, and near industrial and airport zones.**

**Recommendation 11:** Incorporate light pollution; i.e. ‘Reduce and mitigate air, water, light and noise pollution...’.

**Recommendation 12:** Expand this clause to include the entire City Planning Area by removing ‘in neighborhoods, along roadways, and near industrial and airport zones’.

**Goal 8 and Goal 9, Ecosystems 4: Work to eradicate and prevent the spread of invasive species.**

**Recommendation 13:** Specify that this work must be inter-departmental, multi-jurisdictional and delivered with partners, including community groups and non-profit organizations, in order to be effective. Invasive species know no boundaries and move extremely easily along roadways and through watersheds, requiring a landscape-scale approach.

- Specifically, update to read ‘Identify, manage and prevent invasive species with an interdepartmental and collaborative program that includes other agencies, jurisdictions and organizations.’

**Goal 8 and Goal 14, Environment 9: Protect dark skies from light pollution through enforcement of City of Tucson/Pima County Outdoor Lighting Code.**

**Recommendation 14:** Commit to an up to date Outdoor Lighting Code, ensuring that the City of Tucson invests in enforcement of the best available outdoor lighting practices.

- Specifically, update Environment 9 to read: ‘Protect dark skies from light pollution through an update to and enforcement of the City of Tucson/Pima County Outdoor Lighting Code.’

## Goal 9 Narrative

**Recommendation 15:** Introduce a new paragraph that addresses wildlife corridors and crossings.

- Specifically: ‘Natural open space is a crucial element of a healthy Sonoran Desert, but to fully function it must be connected and not isolated. Wildlife corridors are areas of landscape connection that allow wildlife to move freely between natural open spaces, as they need. These corridors connect important habitat areas, such as the wilderness and National Forests, Parks, and Monuments that surround the City of Tucson, for animals but also plants and other living species. Functioning wildlife corridors not only give animals freedom to roam, but they let animals search for the food, water and mates they need and allow for seasonal migration and adaptation in response to fire and drought. In the City of Tucson, and thanks to reports from the Arizona Game and Fish Department, we know that our watercourses—including Rillito River and Tanque Verde Creek, southern Pantano Wash, the Santa Cruz River and other drainages—are wildlife corridors for many species. However, urban development, roadways and other infrastructure seriously threaten and fragment these connections. But there are solutions that are a win-win for wildlife and for people—including natural open space preservation, enhanced connectivity and wildlife crossings such as underpasses or culverts, wildlife bridges, and levee ramps.’

## Goal 9: Preserve, Protect and Enhance Natural Ecosystems.

**Recommendation 16:** Include Land Use 19 in Goal 9, in addition to Goal 14.

**Recommendation 17:** Include Land Use 20 in Goal 9, in addition to Goal 14.

**Recommendation 18:** Introduce a new policy that addresses conflict-free co-existence with urban wildlife. Pima County, at a minimum, makes resources available via its website. The Coalition recommends training materials, contact details and educational programming that help to reduce human-wildlife conflict, to include awareness campaigns on the severe effects of rodenticides for other living species and to also (in line with Ecosystems 1) celebrate our urban wildlife.

- Specifically: ‘**Ecosystems 13:** Introduce tools to improve awareness on living in harmony with urban wildlife.’

**Goal 9, Ecosystems 1:** Preserve and celebrate the beauty of Tucson’s natural landscape and the quality of the Sonoran Desert Ecosystem.

**Recommendation 19:** Update to more clearly connect the beauty and quality of Tucson’s landscape to its natural open space and the role that natural open space plays in the broader ecosystem. Our beautiful landscape depends on high-quality natural open spaces, and the natural open spaces of our neighboring communities are highly interdependent on ours and vice versa.

- Specifically: ‘Preserve and celebrate the beauty and quality of Tucson’s landscape, including its natural open space, and recognize Tucson’s responsibility to the broader Sonoran Desert ecosystem.’

**Goal 9, Ecosystems 2:** Enhance the quantity and quality of open space, prioritizing areas of disinvestment.

**Recommendation 20:** Specify natural open space in addition to open space or remove it from Goal 9 (this is otherwise captured in other Goal 9 policies, if our other recommendations are taken). Otherwise, this goal describes plazas and other types of non-green and disturbed open space that do not contribute to Goal 9’s intent to preserve, protect and enhance natural ecosystems.

**Goal 9, Ecosystems 8:** Increase, protect, and restore urban and regional open spaces and greenways to enhance wildlife connectivity linkages, both within and outside the City limits.

**Recommendation 21:** Strengthen the language used to more clearly advocate for natural open space protection *and* connection, while also updating language to reflect defined terms (see [Recommendation 33](#) and [Recommendation 35](#)).

- Specifically:
  - Replace ‘urban and regional open spaces’ with ‘natural and green open spaces’
  - Replace ‘to enhance wildlife connectivity linkages, both within and outside the City limits’ with ‘that connect or contribute to regional wildlife corridors’
  - Specify that the wildlife corridors referred to in this policy include, at a minimum, those defined by Pima County’s Conservation Lands System. This baseline allows a regionally-aligned approach to landscape connectivity. We

also strongly recommend the City adopt the wildlife corridors mapped by Arizona Game and Fish Department (see *The Pima County Wildlife Connectivity Assessment: Report on Stakeholder Input*, pg. iv. Available at: [https://conservationcorridor.org/cpb/Arizona\\_Game\\_and\\_Fish\\_Department\\_2012-Pima.pdf](https://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf)). These are also available as shapefiles at PimaMaps - SDCP (<https://pimamaps.pima.gov/geoapps/sdcp>). Without defining specific wildlife corridors areas, the City of Tucson may fail to adequately protect and connect its natural open space relative to that of neighboring jurisdictions.

- To summarize, we recommend that Ecosystems 8 reads: ‘Increase, protect and restore natural open spaces and green spaces that connect or contribute to regional wildlife corridors, including those defined by Pima County’s Conservation Lands System.’
- As an alternative, the definition of ‘Wildlife Corridor’ in the Glossary can be updated to read ‘includes, but is not limited to, those defined by Pima County’s Conservation Lands System and Arizona Game and Fish Department.’ so as to shorten this specific policy but not lessen its meaning.

### **Goal 9, Ecosystems 10: Preserve and expand open space by prioritizing infrastructure investments in existing urban areas.**

**Recommendation 22:** Similar to our recommendations for Ecosystems 2, specify the type of open space intended in this context, i.e. ‘Preserve and expand natural open space...’. Otherwise, this goal describes plazas and other types of non-green, disturbed open space that do not contribute to Goal 9’s intent to preserve, protect and enhance natural ecosystems.

### **Goal 12: Strengthen the Local and Regional Economy to Provide Opportunities for All Tucsonans to Thrive.**

**Recommendation 23:** Include **Environment 9** in Goal 12, given the clearly stated economic opportunities presented by the region’s dark skies.

**Recommendation 24:** Include **Ecosystems 1** in Goal 12, given the clearly stated economic opportunities presented by the region’s natural heritage and resources.

## Goal 13: Expand Access to High-Quality Transportation Choices, Enhance Safety, and Improve the Condition of City Streets and Other Infrastructure.

**Recommendation 25:** Introduce a new policy on wildlife crossings into the General Plan, so as to trickle into other standards incl. transportation standards. The Town of Marana, for example, included the following policy in its General Plan policy BE 22-2: “Explore and assess major wildlife crossings of roadways and the feasibility of providing infrastructure to support the wildlife crossing in appropriate areas early in the planning process.” For the City of Tucson, wildlife crossings include structures to cross under and over roads as well as travel in and out of watercourses with steep levees.

We also note that The City of Tucson’s Habitat Conservation Plan (HCP) Technical Advisory Committee discussed and supported the development of Environmentally-Sensitive Roadway Design (ESRD) guidelines for the City of Tucson. These were expected to be a component of the City’s HCP Implementation Strategy, which did not come to light, and would have included guidelines specific to wildlife crossings. As a result, the City of Tucson may not adequately mitigate the environmental risks of roadway design, nor the risk to humans of wildlife on the roadway.

- Specifically, add a new policy: ‘**Environment 11:** Include wildlife crossing research and infrastructure in the transportation planning process.’

## Goal 14 Narrative

**Recommendation 26:** Include a paragraph on Pima County’s Conservation Lands System and its contribution towards the City of Tucson’s goals, including Goal 3, Goal 7, Goal 8, Goal 9, Goal 10, and Goal 12. This is regardless of the extent to which our [Recommendation 29](#) is implemented.

- Specifically: ‘The Conservation Lands System or CLS identifies and categorizes specific areas of land based on its value in supporting and representing biological diversity. It was adopted by Pima County in 2001 following input from over 150 scientists. In the City of Tucson, lands mapped under the CLS mostly correspond to the Santa Cruz River, Pantano Wash and Tanque Verde Creek, as well as parts of the Tucson Mountains foothills. The CLS categories have associated guidelines to encourage conservation, including specific amounts of natural open space that must be set aside (measured by a percentage of the development’s total area). These categories and their guidelines help to not only protect but also connect natural open space, and directly contribute to several of the City of Tucson’s goals. For example, one of the seven CLS categories

includes land considered to be a critical landscape connection or wildlife corridor. The CLS guidelines apply to private developments that need a rezoning or other discretionary changes in land uses. In addition to Pima County, other jurisdictions such as the Town of Oro Valley also recognize the CLS. This regional coordination facilitates a landscape-level approach to conservation.'

### **Goal 14, Land Use 19: Apply Pima County Conservation Lands System map and associated guidelines to future annexations.**

**Recommendation 27:** The Coalition strongly supports the application of Pima County's Conservation Lands System (CLS) to the City of Tucson's future annexations.

- We recommend that the language used in Land Use 19 and Land Use 20 is consistent. Specifically, that you apply the CLS '...map, categories, and policy guidelines and their requirements to future annexations.'

**Recommendation 28:** In support of the implementation of Land Use 19 and Land Use 20, the CLS should be made more evident as a layer in the City of Tucson's MapTucson GIS tool.

### **Goal 14, Land Use 20: Consider the application of the Conservation Lands System designation and requirements in entitlement reviews.**

**Recommendation 29:** Adopt in full the Pima County Comprehensive Plan's Conservation Lands System map and associated guidelines into the City of Tucson General Plan, in turn creating an action plan to address the preliminary draft policy Ecosystems 1. Secondly, align the application language with Land Use 19.

- Specifically: update to 'Apply Pima County Conservation Lands System map, categories, and policy guidelines and their requirements to entitlement reviews.'
- **Background on the Conservation Lands System:**
  - The Conservation Lands System (CLS) is part of Pima County's Comprehensive Plan - Regional Plan Policy Environmental Element, originally adopted in 2001.
  - In short, the CLS applies a biological value to all land within Pima County and is a set of guidelines for open space set-aside, configuration, and other site-based conditions for development projects that go through the rezoning process.
  - If a landowner develops on their property and does not request a legislative action related to "new rezoning and specific plan requests, time extension requests for rezonings, requests for modifications or waivers of rezoning or

specific plan conditions, including substantial changes, requests for Comprehensive Plan amendments, Type II and Type III conditional use permit requests, and requests for waivers of the subdivision plat requirement of a zoning plan ,” then the CLS does not take effect.

- The CLS can be summarized by the following five principles:
  - Perpetuates the comprehensive conservation of vulnerable species;
  - Retains those areas that contain large populations of focal vulnerable species;
  - Provides for the adjacency and proximity of habitat blocks;
  - Preserves the contiguity of habitat at the landscape level; and
  - Retains the connectivity of reserves with functional corridors.
- **Background on the Conservation Lands System and Plan Tucson:**
  - In 2005, the City of Tucson incorporated the CLS into MapTucson under the layer ‘Priority Biological Resource categories’. We recommend this is updated to more clearly connect to the CLS.
  - On October 21, 2008, the City Council adopted a policy to include Pima County’s Conservation Lands System map and associated guidelines in future annexations.
  - The City of Tucson codified the 2008 policy approved by the City voters by including two policies in the 2013 General Plan that adopted the Conservation Lands System:
    - LT20 Apply Pima County Conservation Lands System map and associated guidelines to future annexations.
    - LT21 Consider the application of the Conservation Lands System designation and requirements in rezoning reviews.
  - In the application of LT21, especially, the word ‘Consider’ has presented undue confusion and, as such, it must be replaced with a stronger action word.
    - Only one other draft General Plan policy uses ‘Consider’ in a similar manner (Historic 7).
    - In one example from a Zoning Examiner meeting held in 2025, The Planning Center employee Lexy Wellcott stated that the “CLS is not applicable within the City confines,” perhaps a misinterpretation of the General Plan’s currently ambiguous language. This is not an isolated interpretation: this language must be strengthened to respect the original intent of the City of Tucson and its voters.
    - CSDP further notes that The Planning Center, including Lexy Wellcott specifically, are listed as Planning Consultants for the draft *Plan*

*Tucson 2025* and so should appreciate the relevance and application of the current General Plan's LT21 as well as **Land Use 20**.

- For context, CLS areas located within the City of Tucson concentrate around the Santa Cruz River, Pantano Wash, Rillito River and Tanque Verde Creek and areas of the Tucson Mountain Foothills. Protection of the City's watercourses, especially, are already captured in the preliminary draft in Goal 7 and Goal 9.
- Amending policy **Land Use 21** also helps the City of Tucson to satisfy policy **Ecosystems 1**. The preliminary draft already states that it intends to 'Preserve and celebrate the beauty of Tucson's natural landscape and the quality of the Sonoran Desert ecosystem'. However, the City does not have a planning tool to preserve its natural open space.
- **Summary:**
  - Adopting the Conservation Lands System will exemplify regional coordination and allow for better cooperation with Pima County on conservation issues.
  - Ambiguities presented by the current General Plan's LT21 policy will be resolved.
  - The CLS supports many of the preliminary draft's goals, including Goal 3, Goal 7, Goal 8, Goal 9, Goal 10, and Goal 12 and numerous related policies.
  - Specifically, land currently within the City of Tucson and located within one of the CLS land categories will gain conservation protection consistent with CLS lands outside of the City of Tucson, responding to the City's connectivity goals in line with Ecosystems 8.

## Appendix A: Glossary, 'Biodiversity'

**Recommendation 30:** Broaden definition to recognize all living species (including but not limited to flora and fauna), as is globally accepted by the Convention on Biological Diversity and other standard setting bodies. We note that biodiversity is not used at all outside of the Glossary and that this concept and its importance should be incorporated in the narrative, including on pg. 126.

- Specifically, replace the first sentence with: 'Short for 'biological diversity', biodiversity is the variety of all living species and ecosystems.'

## Appendix A: Glossary, 'Dark skies ordinance'

**Recommendation 31:** The City of Tucson and Pima County use the term 'Outdoor Lighting Code'. To prevent confusion, update the Glossary to replace 'Dark Skies Ordinance' with 'Outdoor Lighting Code'.

**Recommendation 32:** Update the definition for 'Outdoor Lighting Code' to specifically mention light pollution (vs. specific types of light pollution), the term 'dark skies' and other intended outcomes of the Code, including environmental sensitivity.

- Specifically: 'Outdoor lighting standards that protect local character and regional dark skies, enhance visual safety and mitigate the harmful effects of light pollution on the environment and on astronomical pursuits. Light pollution includes glare, light trespass, visual clutter, and skyglow.'

## Appendix A: Glossary, 'Natural Open Space', 'Open Space' and 'Green Space'

**Recommendation 33:** Update the definition of Natural Open Space to more clearly reflect that this open space must be undisturbed, except for where essential and expert-led habitat restoration or enhancement work must take place.

- Update 'Natural Open Space' to replace 'unimproved' with 'undisturbed'. By using 'undisturbed', which implies land that has not been significantly altered from its natural state, the City of Tucson can align their natural open space policies with those of Pima County and other regional jurisdictions. In the definition, using only 'unimproved' also risks referring to vacant land that has been disturbed by human activity. It is critical that natural open space refers to that which is undisturbed.
- The term 'essentially' must be removed to avoid confusion.
- Note that Pima County uses the full phrase 'undisturbed natural open space', which we strongly suggest the City of Tucson also uses in place of 'Natural Open Space' to avoid confusion with other types of open space.
- Specifically, update the definition to read: 'Any area of land that is undisturbed, with the exception of essential and expert-led habitat restoration or enhancement work, and that is set aside, dedicated, or reserved in perpetuity as a public or private preservation or conservation area.' Remove cross-references to Open Space and Green Space.
- We also note that 'natural open space' was used only once in the preliminary draft outside of the Glossary. We strongly encourage more thorough application of the term, including in areas such as pg. 50 and pg. 71.

**Recommendation 34:** Update ‘Open Space’ to include functional green space, but not natural open space.

- Specifically: ‘Land that is not enclosed, that is disturbed and/or improved, and that is available and managed for functional public use. Can include green space such as parks and public trails (see Green Space).’

**Recommendation 35:** Update ‘Green Space’ definition to capture a subset of open space as well other green infrastructure, such as green drainage systems that are not intended as public space.

- Specifically: ‘Vegetated open space that is managed, disturbed and/or improved. Can include parks and public trails (see Open Space) as well as green infrastructure. Does not include Natural Open Space.’

## Appendix A: Glossary, ‘Urban Forest’

**Recommendation 36:** The City’s approach to urban forests is tree-centric and does not adequately capture the critical importance of shrub and groundstory vegetation in reducing ground temperature in the urban realm. We do note that you reference ‘associated vegetation’ on pg. 126 of the draft. This concept should be better elaborated upon in the definition.

- Specifically: Update the definition to: ‘...and associated native or desert-adapted vegetation, including shrub and groundstory vegetation.’

## Appendix A: Glossary, ‘Wildlife Corridor’

**Recommendation 37:** To ensure regional consistency, replace the definition with ‘An area of land used by wildlife to move between or within habitat blocks in order to complete activities necessary for survival and reproduction. Also referred to as a wildlife linkage’.

- Source: Arizona Game and Fish Department (2012) *The Pima County Wildlife Connectivity Assessment: Report on Stakeholder Input*, pg. iv. Available at: [https://conservationcorridor.org/cpb/Arizona\\_Game\\_and\\_Fish\\_Department\\_2012-Pima.pdf](https://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf).

- As per [Recommendation 15](#) and [Recommendation 21](#), ensure the defined term is used, and used appropriately, in Plan Tucson. The current draft refers to wildlife corridors once but also refers to ‘wildlife connectivity linkages’ in policy Ecosystems 8.

## Appendix A: Glossary

**Recommendation 38:** Introduce a definition for wildlife crossings, which differ from wildlife corridors. Wildlife crossings help to connect wildlife corridors where they have been separated by human activities (as currently defined under ‘Wildlife Corridor’ in the draft).

- Specifically, define ‘Wildlife Crossing’ as: ‘A designated area to connect wildlife corridors that have been separated by human activities or structures, such as development, roads, or land clearings.’

**Recommendation 39:** Introduce a definition for pollutants, as already defined on pg. 114.

- Specifically, define ‘Pollutants’ as: ‘Includes solid or hazardous waste, potentially contaminated sites (brownfields), air quality, noise, light pollution, and water quality issues.’

**END.**