



Coalition for Sonoran Desert Protection

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January 6, 2015

Arizona Center for Law
in the Public Interest

Arizona League of Conservation
Voters Education Fund

Arizona Native Plant Society

Bat Conservation International

Cascabel Conservation
Association

Center for Biological Diversity

Center for Environmental
Connections

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Drylands Institute

Empire Fagan Coalition

Environmental and Cultural
Conservation Organization

Environmental Law Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro National
Park

Friends of Tortolita

Gates Pass Area Neighborhood
Association

Native Seeds/SEARCH

Neighborhood Coalition of
Greater Tucson

Northwest Neighborhoods
Alliance

Protect Land and
Neighborhoods

Safford Peak Watershed
Education Team

Save the Scenic Santa Ritas

Sierra Club—Grand Canyon
Chapter

Sierra Club—Rincon Group

Silverbell Mountain Alliance

Sky Island Alliance

Sky Island Watch

Society for Ecological
Restoration

Sonoran Arthropod
Studies Institute

Sonoran Permaculture Guild

Southwestern Biological
Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

Women for Sustainable
Technologies

Mayor Ed Honea and Councilmembers

Town of Marana

11555 W. Civic Center Drive

Marana, AZ 85653

RE: Lazy K Bar Ranch Rezoning and General Plan Amendment Applications

Dear Mayor and Councilmembers:

Thank you for the opportunity to provide comments on the Lazy K Bar Ranch Rezoning and General Plan Amendment applications.

I am writing on behalf of the Coalition for Sonoran Desert Protection. Founded in 1998 and comprised of 41 organizations, the Coalition is committed to the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning.

Coalition representatives have met on many occasions with Mattamy Homes and their representatives to discuss the proposed development. We provided them with specific feedback and guidance on how to best develop this parcel while retaining the values that make this parcel so unique and important.

The Coalition requests that the following be incorporated at the time of adoption of the General Plan Amendment and Specific Plan. **Should these Conditions be incorporated and adopted by Mayor and Council, the Coalition is prepared to support these Applications:**

- 1. The site plan shall be revised such that no encroachment of residential lots shall occur into a 300-foot buffer on the western side of the property. Disturbance within this area will be limited to the local roadway, roadway cut slopes, the internal loop trail per the Specific Plan and utilities. Revegetation for disturbed areas utilizing native trees, shrubs and seed mix shall be permitted within the buffer;*
- 2. The Land Use Concept Plan provided in Exhibit III.E.1 of the Specific Plan shall be replaced with the attached site plan.*
- 3. Disturbance of the 150-foot buffer along the northern side of the property shall be limited to utilities, public trail and reseeding of native plants in disturbed areas;*
- 4. No lots shall encroach into Important Riparian Areas as delineated in the Specific Plan;*
- 5. The sidewalk along the westernmost roadway shall be located on the eastern aspect adjacent to the residential lot; as provided in the Specific Plan. No sidewalk shall be placed on the western side of the roadway adjacent to the buffer where there are no residential lots;*

6. *Said westernmost roadway shall incorporate vegetative screening along its western aspect, adjacent to the buffer, as follows: native trees, including ironwood, mesquite, foothills and blue paloverde and catclaw acacia shall be established and maintained in a staggered fashion no less than 40 feet on center; native shrubs, such as hackberry, wolfberry and other lycium species, shall be interspersed amongst the trees; native groundcover, such as mammalaria, opuntia species, brittlebush, triangle leaf bursage and native grasses shall be incorporated within the vegetative screening. All vegetation within the vegetative screening area, with the exception of saguaros and ironwoods, shall be established and maintained via irrigation for a period not less than five years prior to any weaning off supplemental irrigation. Irrigation may continue indefinitely, as needed, to maintain the vegetated screen of the buffer. Vegetation mortality within the vegetative screening area shall trigger replanting of identical plants to supplement the species that die. A plant palette for the vegetative screening shall be developed with the assistance of the Coalition for Sonoran Desert Protection;*
7. *Native existent salvageable ironwoods and saguaros within any authorized disturbance area shall be transplanted and re-established on site with mortality triggering replacement of said species. Disturbance of saguaros greater than six feet in height shall be mitigated by planting and establishing two saguaros between four and six feet in height for each saguaro greater than six feet in height disturbed. Saguaros and ironwoods shall be monitored for a ten year period and mortality shall trigger replacement of same;*
8. *The Homeowner's Association shall be responsible for controlling and eradicating non-native invasive species in all common areas;*
9. *No fencing of individual residential lots shall be allowed except for ordinary and customary side and rear fencing and walls of a typical residential subdivision. All new fencing along the perimeter of the property required per the Specific Plan shall be wildlife-friendly fencing as described by the Arizona Game and Fish Department; and*
10. *Conditions #1, #3, #6, #7, #8 and #9 shall be recorded in the project's CC&R's to ensure the future Homeowners Association is aware of and obligated to follow these restrictions.*

Should the Mayor and Council adopt this language as Conditions of the Specific Plan this evening, the Coalition is prepared to support Ordinance No. 2015.001: Lazy K Bar Ranch Specific Plan; Minor amendment to the General Plan; and the Lazy K Bar Ranch Development Agreement.

Sincerely,



Carolyn Campbell
Executive Director

Cc: Gilbert Davidson, Town Manager
Ryan Mahoney, Planning Director

