



## Coalition for Sonoran Desert Protection

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May 29, 2013

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

Ladd Keith, Chair  
City of Tucson Planning Commission  
255 W. Alameda St.  
Tucson, AZ 85701

### RE: Final Plan Tucson Draft

Dear Chair Keith and Members of the Commission:

Thank you for the opportunity to provide a few brief comments on the City of Tucson's Final Plan Tucson Draft. I am writing on behalf of the Coalition for Sonoran Desert Protection. Founded in 1998 and comprised of 41 organizations, the Coalition is dedicated to creating a community where ecosystem health is protected; nature and healthy wild animal populations are valued; and where visitors, children and future generations can all drink clean water, breathe clean air, and find wild places to roam. We achieve this vision by concentrating on the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning.

We provided comments on earlier drafts of Plan Tucson at public meetings and workshops held on various sections of the plan. Our comments focused on the inclusion of Pima County's Conservation Lands System map and associated guidelines in future annexations, per a policy adopted by the Tucson City Council on October 21, 2008.

We fully support the language currently included in the Final Draft of Plan Tucson in the Land Use, Transportation, and Urban Design section related to the Conservation Lands System:

LT20 Apply Pima County Conservation Land System map and associated guidelines to future annexations.

LT21 Consider the application of the Conservation Land System designation and requirements in rezoning reviews.

These policies will create important continuity for regional conservation among local jurisdictions and codify the policy adopted by the City Council in 2008. The Conservation Lands System (CLS) is a science-based approach to protecting our most valuable and biologically-rich lands while directing development to more appropriate lands. Since its initial development and adoption by Pima County in 2001 (with revisions adopted in 2005), the CLS has been applied successfully to

preserve our increasingly rare riparian areas, along with important Sonoran Desert wildlife habitat. The Town of Oro Valley also recently used the CLS as the starting point for its Environmentally-Sensitive Lands Ordinance (ESLO), adopted in 2011, even going so far as to integrate two CLS categories in their entirety into the ESLO.

We appreciate the City's willingness to listen to our recommendations regarding the application of CLS policies during annexations and the inclusion of these policies in Plan Tucson. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive style with a large, prominent initial 'C'.

Carolyn Campbell  
Executive Director