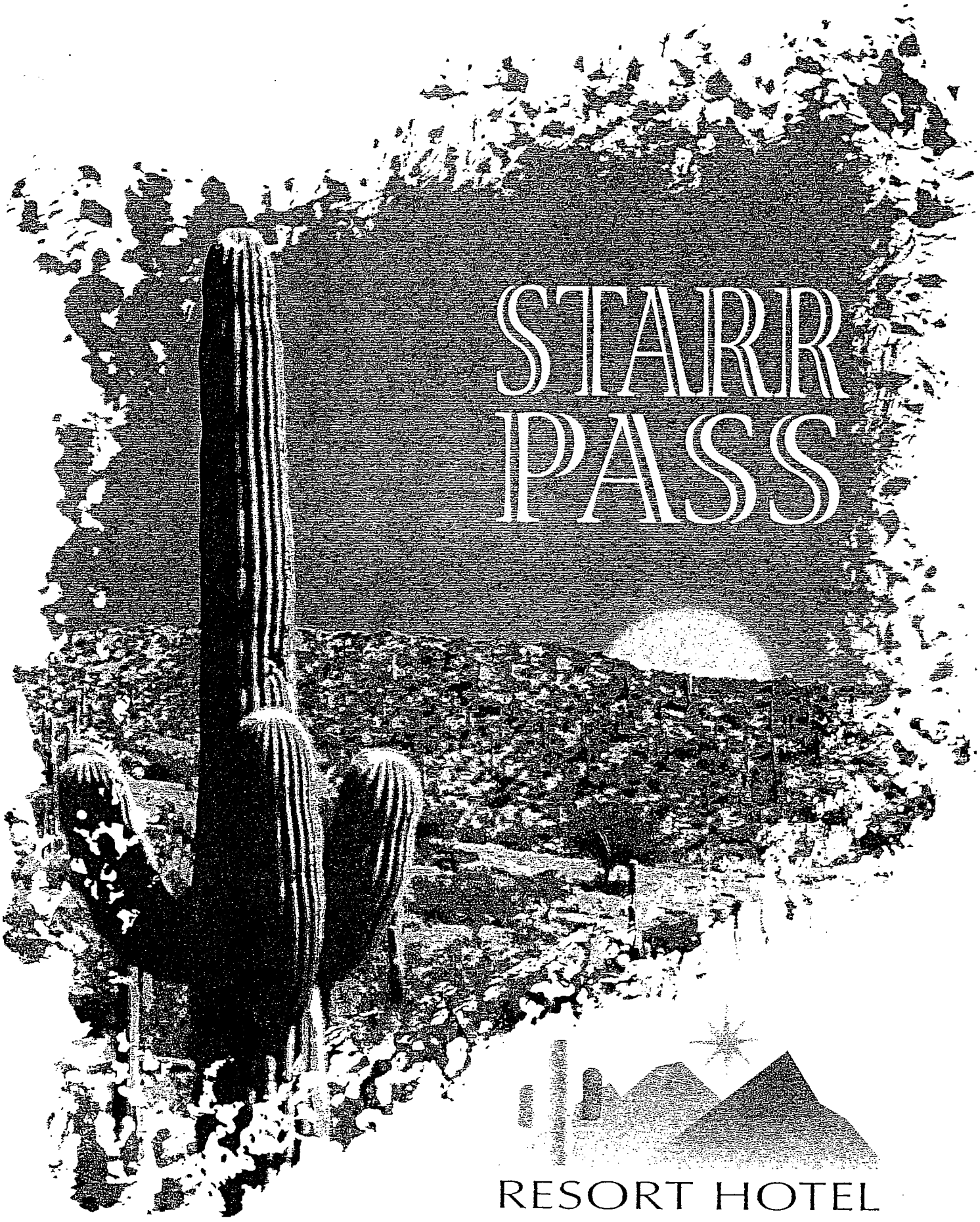

ATTACHMENT B

STARR PASS RESORT HOTEL SPECIFIC PLAN

August 11, 1998

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SPECIFIC PLAN
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1.0 EXECUTIVE SUMMARY

1.0 EXECUTIVE SUMMARY

1.1 Overview

The Starr Pass Resort Hotel Specific Plan provides the planning framework for the environmentally sensitive development of a resort hotel and related golf course focused on the desert. Consistent with its purpose, as defined in Chapter 18.90 of the Pima County Zoning Ordinance, the Specific Plan implements the County's Comprehensive Plan – The land use proposals are in compliance with the Pima County Comprehensive Plan's Resource Transition land use designation. The Specific Plan Document provides more site-specific development regulations for the planned resort hotel.

The Specific Plan site is a 197 acre parcel of land, known as the Anklam Property. It is situated on the County's boundary with the western part of the City of Tucson, immediately adjacent to Starr Pass – a master planned residential/resort community into which the proposed resort hotel will be integrated.

The 575-room resort hotel and related amenities will be clustered on a small area, so that 75% of the site can be conveyed as natural area to public ownership. This dedication is far in excess of the County's requirements for developments adjacent to the Tucson Mountain Park, as regulated by the Pima County Buffer Overlay Zone Ordinance. The underlying design strategy is to preserve Biological Corridors that link the Tucson Mountain Park with the University of Arizona Desert Laboratory, in order to preserve a 97-year old research project on wildlife habitat and native vegetation.

1.2 Development Goals and Objectives

Goal 1: Integrate the resort hotel site with the surrounding uses in a manner that maximizes the natural assets and strengthens the environmental quality.

The following planning objectives will be pursued in support of this goal:

- To enlarge the existing Starr Pass Master Plan Area without expanding the development rights, thereby, increasing the amount of open space and reducing the overall development density.

- To establish Biological Corridors for the preservation of native vegetation and the safe movement by wildlife among the Tucson Mountain Park and Tumamoc Hill and the University of

Arizona Desert Laboratory.

- To minimize the visual impact from neighboring properties by locating site improvements outside of primary viewsheds and by adopting a design vocabulary that reflects the local desert environment.

Goal 2: Preserve and enhance the integrity of the desert environment and mitigate any impacts to natural conditions.

The following planning objectives will be pursued in support of this goal:

- To minimize site disturbances by clustering buildings in small areas of medium density and by restricting the number of surface parking areas.

- To adopt site planning strategies and design principles consistent with the performance standards of the Buffer Overlay Zone.

- To carefully control site improvements with detailed development regulations, design guidelines and monitoring programs.

Goal 3: Establish a world-class destination resort that will be commercially successful and contribute to the economic growth of the Tucson area.

The following planning objectives will be pursued in support of this goal:

- To establish a comprehensive building program that contains all the necessary elements to successfully appeal to sophisticated resort guests and convention markets.

- To design a horizontal and vertical building organization that effectively relates indoor and outdoor spaces while ensuring an efficient operation of the facility.

- To maximize public benefits by servicing the resort with existing infrastructure and private improvements while increasing tax revenues and economic spin-off.

1.3 Development Opportunities and Constraints

The site, which is located in the foothills of the Tucson Mountains, is currently undeveloped and is

characterized by rolling terrain, native vegetation, and unobstructed views of the City of Tucson. The Starr Pass community is immediately adjacent to the east and south of the site.

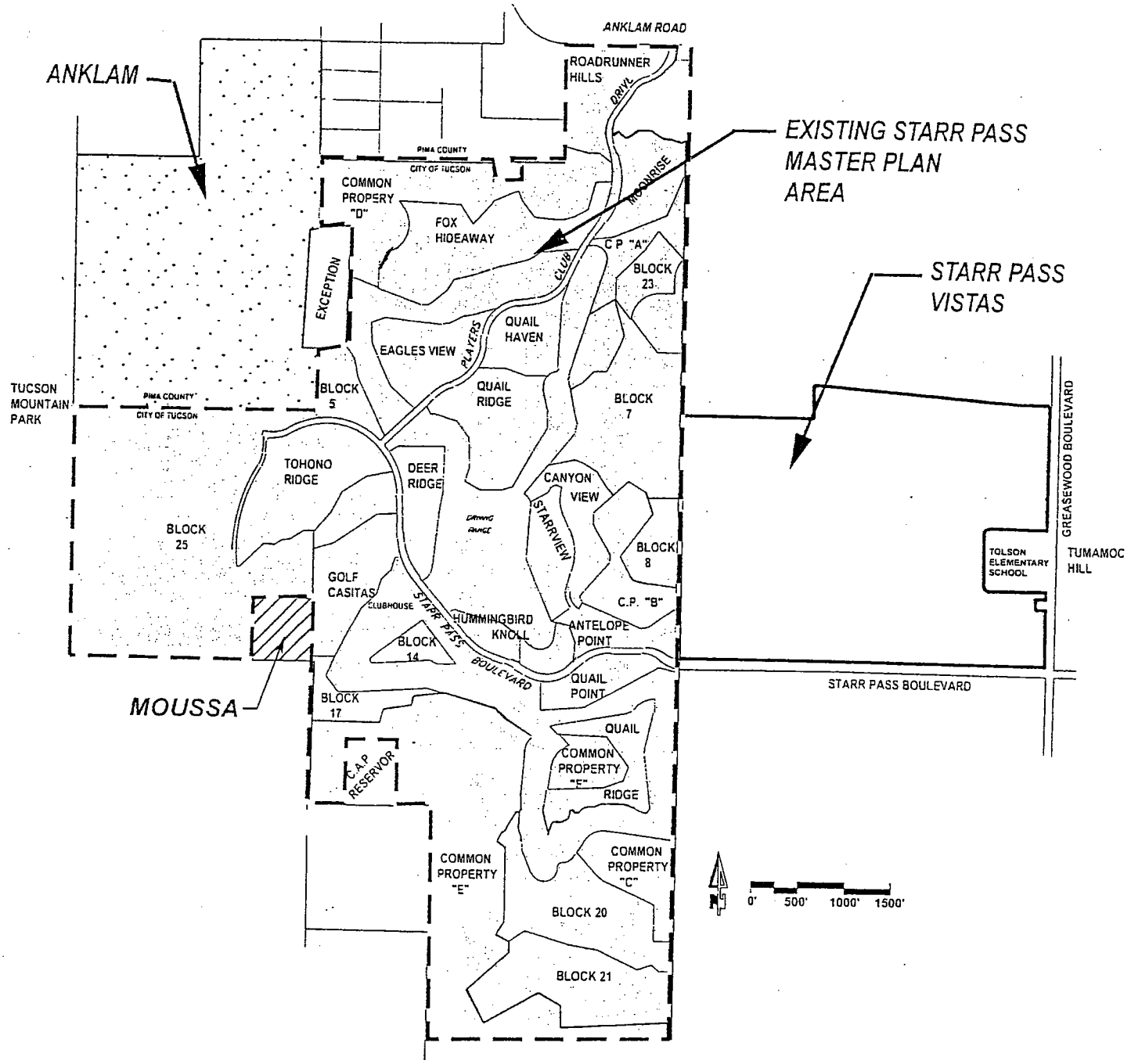
Starr Pass was approved by the City of Tucson in 1984 for 2,197 residential units and a 600-room resort. In 1992, Signature Properties International, LP (the applicant for this Specific Plan) purchased Starr Pass out of bankruptcy and proceeded to replat the property by down-zoning by 697 residential units and increasing the open space by 25%. The incorporation of the new resort hotel, proposed by this Specific Plan, will further increase the open space by 213 acres (including the Biological Corridors through the existing Starr Pass area) without change in development rights or intended uses – resulting in an overall density reduction. The expanded Starr Pass Master Plan will cover four areas: the Anklam Property (subject of this application) – 197 acres; the Starr Pass Master Plat area – 926 acres; the Moussa Property – 10 acres; and, Starr Pass Vistas to the east – 237 acres. Combined, these properties cover 1,370 acres and establish an effective link between the Tucson Mountain Park and Tumamoc Hill. (see Exhibit 1.3-A)

The proposed development of the site and the expanded Starr Pass area is not only compatible with the existing surrounding land uses – mostly low-density residential areas or undeveloped land – but is consistent with the planning policies adopted by the two responsible jurisdictions – the Pima County Comprehensive Plan (Tucson Mountain – North Subregion) and the City of Tucson Tumamoc Area Plan. Resource Transition, the land use designation under the County's Comprehensive Plan permits a major resort with golf course, along with low-density residential uses, in order to provide a buffer transition from park land to higher density urban uses.

1.4 Specific Plan Proposal

The Specific Plan proposes three land use categories: Hotel – 40 acres; Golf Course – 8 acres; and, Natural Area – 149 acres. The significant natural washes that cross the site determine the location of the proposed Biological Corridors and separate the land uses.

A careful consideration of the site's topography, hydrology, vegetation, and viewsheds naturally delineates areas where – cumulative development constraints notwithstanding – the construction of site improvements is possible. The area set aside for the resort hotel use has been designed to accommodate the development in a compact form that consolidates the building program in multi-story structures with underground parking, in order to effectively minimize any site disturbances. The resulting three-dimensional profile is intended to be compatible with the backdrop of the mountain range.



Starr Pass Ownership Map
Exhibit 1.3-A

The building program includes 575 guest rooms, several restaurants, conference facilities, a spa, swimming pools, service retail, and tennis courts.

The golf course area follows the biological corridor and is an extension and integral component of the Starr Pass golf course. As a low-impact target course, it will use turf areas interspersed within the natural desert environment.

Vehicular access and site circulation keeps guest traffic and service vehicles apart, in order to minimize conflicts. Access is through the Starr Pass area, consistent with the original long-term transportation planning.

1.5 Development Regulations

Development standards and design guidelines are being proposed as implementation tools to ensure built-form solutions and landscaping concepts reflecting regional design vocabularies and sound ecological principles, as follows:

- Site coverage ratios and development densities will be low in conformance with the transitional use character of the site.
- Built forms will be harmonious with the form, scale, texture, materials and color of the natural mountain landscape.
- Exterior treatment and colors will be muted and blend with local colors and textures.
- No highly reflective finishes will be used and building components displeasing to the eye will be screened with vegetation or painted to reduce visibility.
- Exterior lighting, generally, will be of low intensity and low profile.
- Utilities will be installed underground and, wherever practical, be placed within the paved portion of roadways.
- Existing washes will be preserved as much as practical, and any disruption from roadway, utility, and trail crossings shall be effectively mitigated.

1.6 Implementation

The Starr Pass Resort Hotel Specific Plan is anticipated to be implemented immediately subsequent to its adoption by the Board of Supervisors of Pima County. A Draft Development Agreement is included as Appendix 1.

An agreement will be executed with Pima County regarding a proposed Environmental Enhancement Fee. A 2% user fee will be charged to hotel guests for a 20-year period and remitted to a Parkland Foundation (a Land Trust) to cover the costs of land acquisition, maintenance, and operation of the proposed Biological Corridor system in the Tucson Mountain Park area.

2.0 SITE INVENTORY

2.0 SITE INVENTORY

2.1 Site Location

The Starr Pass Resort Hotel site is approximately 197 acres and is located in portions of Sections 7 and 18 of Township 14 South, Range 13 East. It lies on the western edge of the City of Tucson limits and is sandwiched between Tucson City limits and Tucson Mountain Park. The property's east boundary follows along portions of the eastern line of Sections 7 and 18. It includes the southeast quarter of the southeast quarter of Section 7 and the northeast quarter of Section 18. The property shape is stepped. The Area Map on Exhibit 2.1-A shows the relationship of the property in its regional context and the Location Map on Exhibit 2.1-B shows the specific site location.

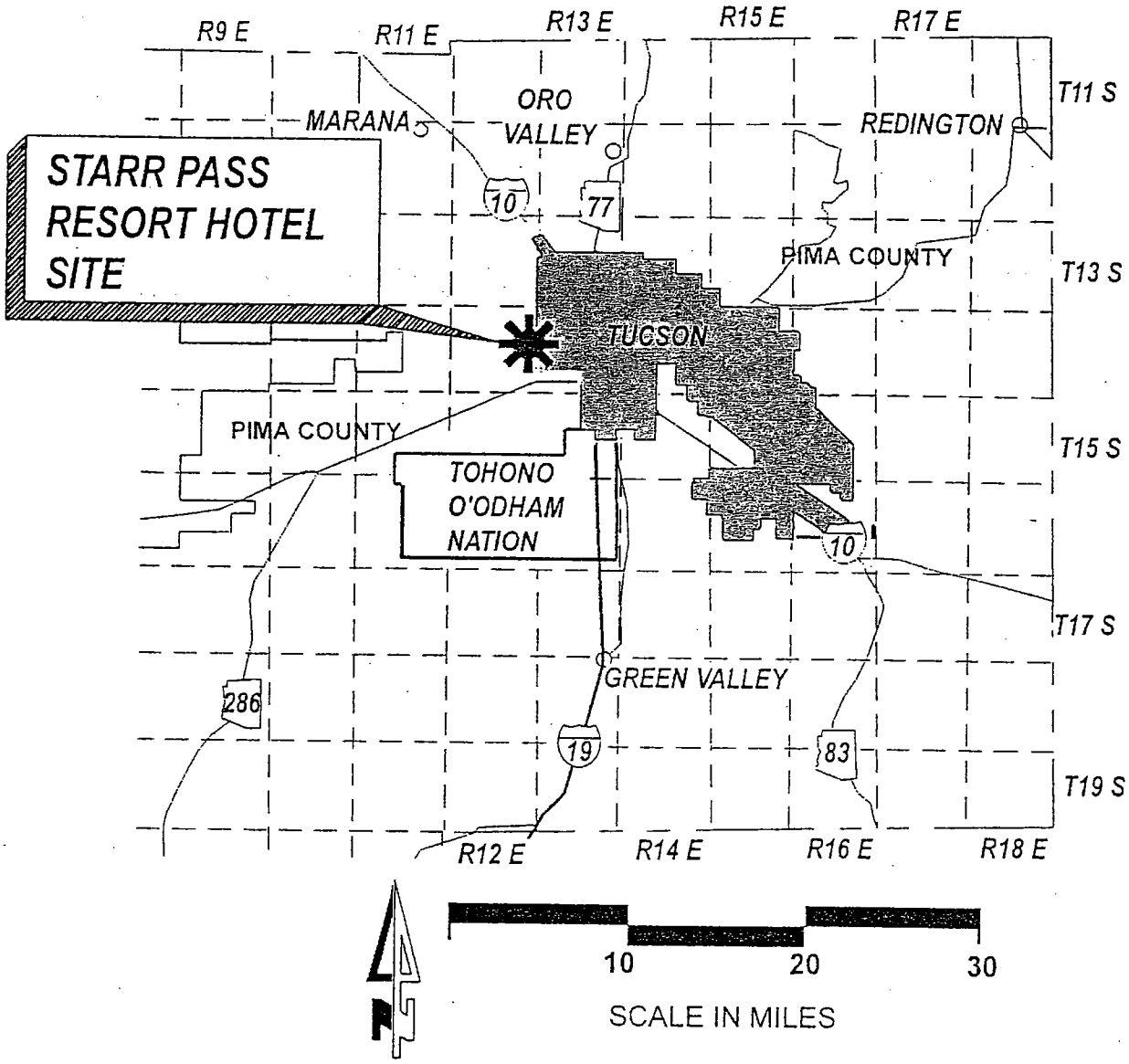
2.2 Existing Land Use

The area surrounding the site is primarily mixed use residential with elementary, middle and high schools, Pima Community College, and several parks. The hotel site borders along the east side of Tucson Mountain Park which is a 21,000 acre Pima County Regional Park offering many public and private activities and facilities. The only direct access to Tucson Mountain Park from the Starr Pass area is through an existing hiking trail system. There are other City parks and recreational facilities in the area which will be described under the Parks and Recreation [Section 2.14].

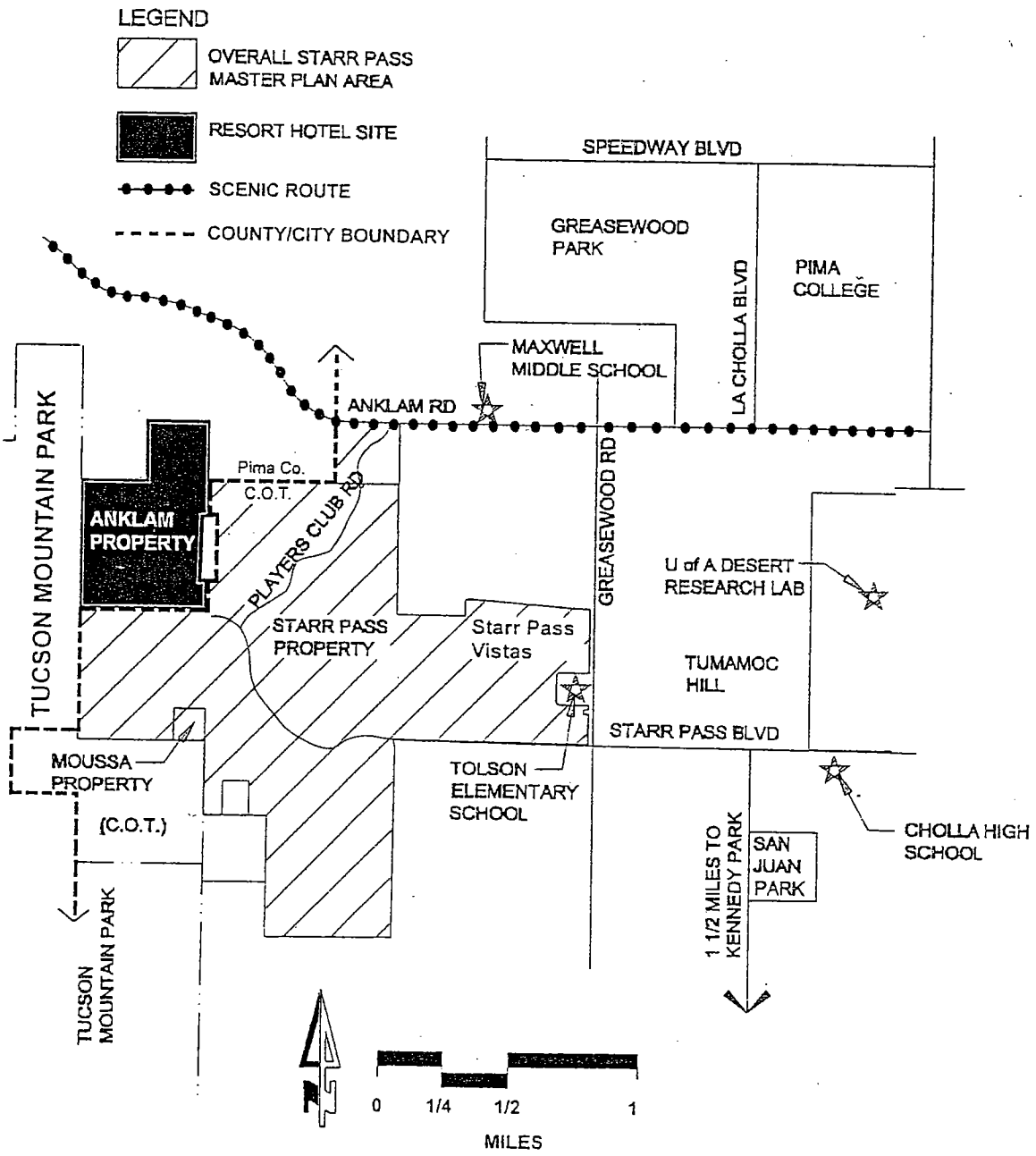
There is a wide diversity of housing types in the area which range from medium-high density apartment style living to low density single family detached residences. Mobile home parks, single mobile home residences, townhomes and time share units combined with single family detached residential, from 1 residence for every 3.3 acres to approximately 3 residences per acre, make up the residential uses in the area. The current development density for Starr Pass is approximately 1.85 residences per acre. Starr Pass and other recent developments have been designed to cluster subdivision standards to maximize the open space in the area.

2.2.1 Current Site Uses

The property is currently vacant with no existing structures or utilities of any kind. The site is in its undisturbed natural state, which reflects the typical Sonoran Desert habitat.



Area Map
Exhibit 2.1-A



Location Map
Exhibit 2.1-B

2.2.2 Surrounding Land Uses

The parcel and all adjacent properties are vacant. The surrounding area is planned for residential uses except for the adjacent Tucson Mountain Park. The nearest developed residential area is Starr Pass. Starr Pass Master Plan is a residential cluster subdivision with pockets of density ranging from single family detached residential of one resident for 1.25 acres to approximately 15.7 residences per acre for apartment style living. (see exhibits 2.2-A and 2.2-B)

2.2.2.1 Two Story Homes

There are two houses within a quarter mile of the Specific Plan that are two story. These homes, unless excepted by variance, are allowed to a maximum of 24 feet in height. This height restriction is imposed on the Starr Pass Master Plat area because it is a City of Tucson, Hillside Development Zone subdivision. (see Two Story Home Locations on Zoning Exhibit 2.4-A)

2.2.2.2 Approved Zoning/Plans

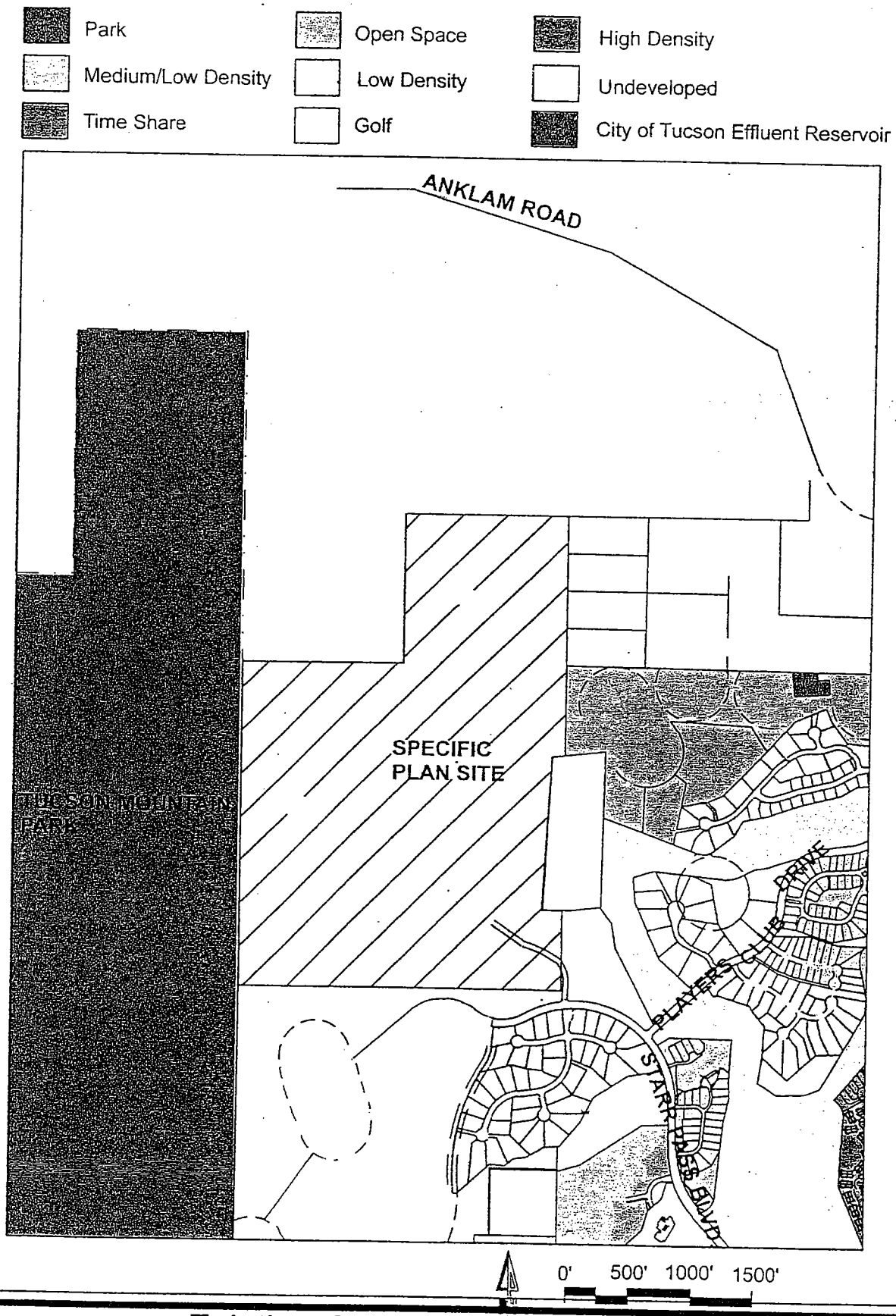
Signature Properties is currently processing a final block plat for Starr Pass Vistas LLC. through the City agencies. Tohono Ridge subdivision located just south of the site is currently under construction for Phase II. This subdivision is designed for custom homes for single family detached residential with a density of one residence per .75 acres.

2.2.2.3 Well Sites

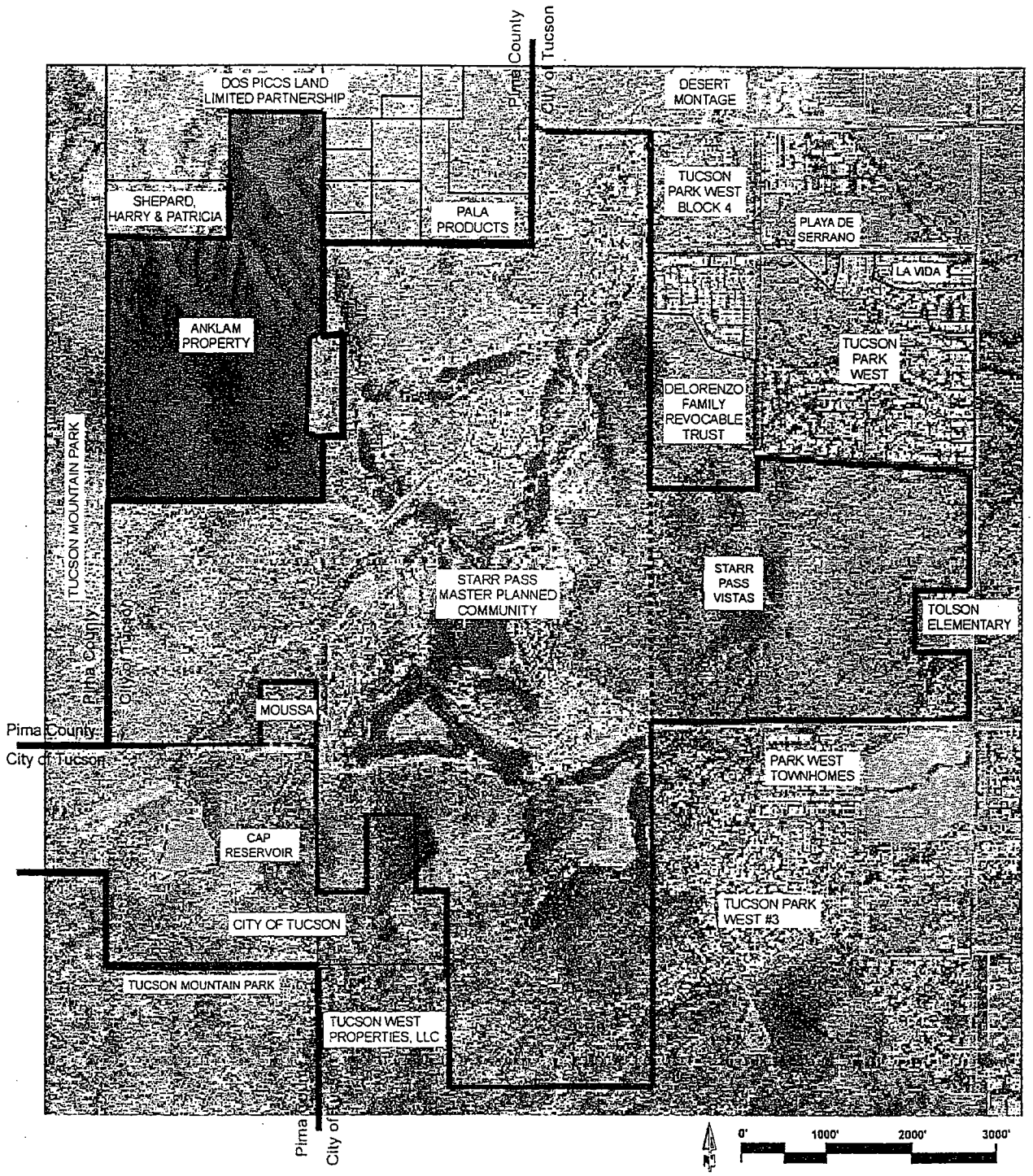
The Arizona Department of Water Resources was contacted. Their records show that there are no registered well sites within 100 feet of the property.

2.3 Existing Planning Policies

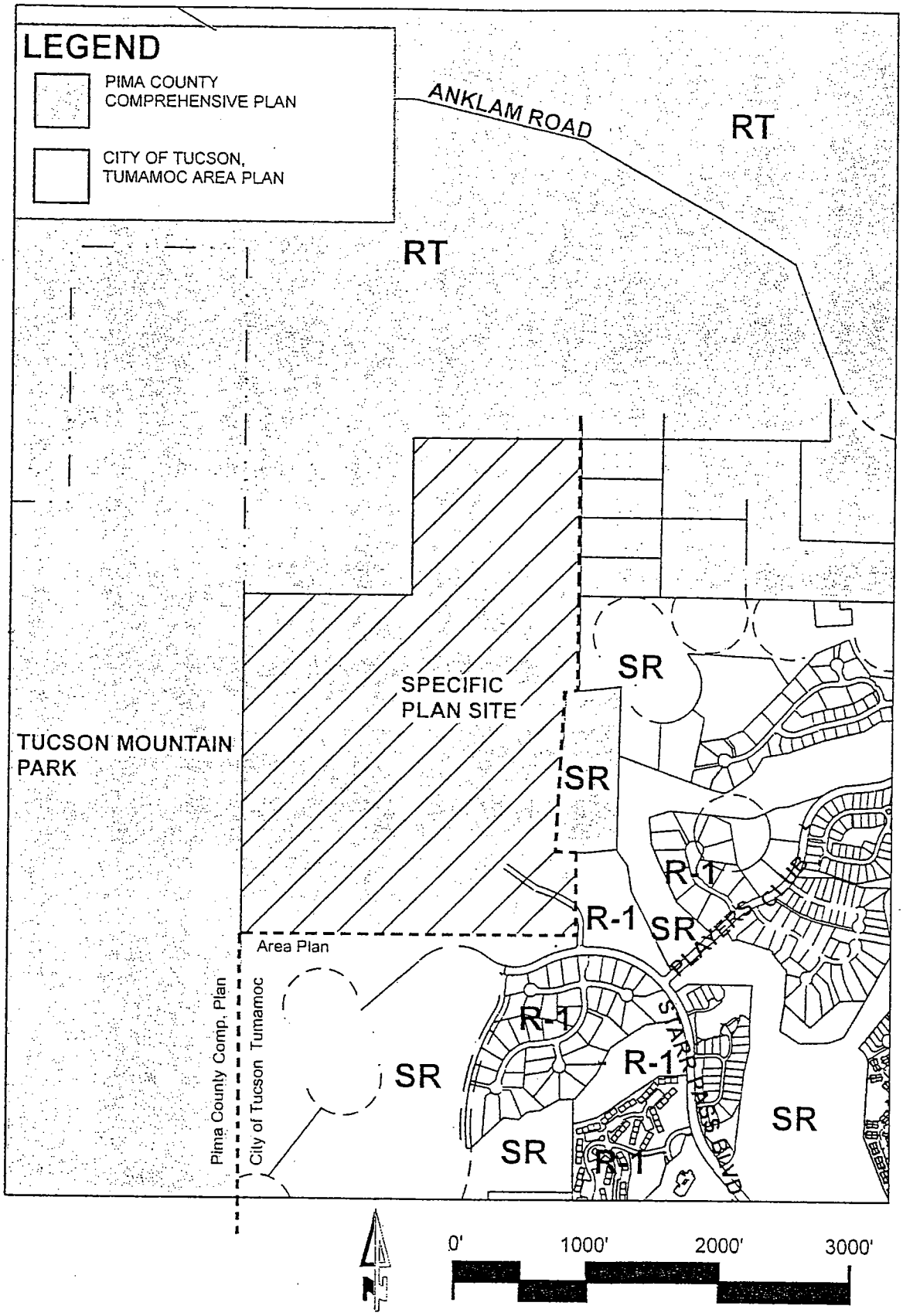
Pima County Planning and Zoning policies are regulated by the Pima County Comprehensive Plan document and the Pima County Zoning Code ordinances. The Comprehensive Plan is a long range regional planning document that incorporates guideline policies for regional development. The hotel property is located within the Tucson Mountain Park - North Sub-region of the Comprehensive Plan document. Specific Plan and rezoning requests must be in conformance with this document, otherwise a plan amendment is required prior to the specific plan or rezoning process. As this Specific Plan Proposal is completed in accordance with the Comprehensive Plan, no amendment is required. Specific plans or rezonings are approved usually with site specific conditions. The re-



Existing Surrounding Land Use
Exhibit 2.1-A



Existing Surrounding Subdivisions and Parcels
Exhibit 2.2-B



Area Plan Boundaries and Designations Map
Exhibit 2.3-A

zoned development shall be implemented in adherence to those special conditions and to current zoning code requirements. (see Exhibit 2.3-A, Area Plan Boundaries and Designations Map for the two Area Plan Locations)

2.3.1 Pima County Comprehensive Plan

The sub-regional plan for this area is the Pima County Comprehensive Plan, Tucson Mountain - North Subregion. The Comprehensive Plan designates Resource Transition as the land use classification. Resource Transition allows for a major resort with golf course and for low density residential. The intent of this land use classification is to provide a low density buffer transition from park lands to the higher urban density residential areas.

Under the Comprehensive Plan document, the site area is included in Special Area 5-01, Tucson Mountains North. The purpose of this policy is to plan: 1)declining westward land use intensities; and 2) low density conservation area and buffer to Tucson Mountain Park and Saguaro National Park.

2.3.2 City of Tucson, Tumamoc Area Plan

The Tumamoc Area Plan recently completed an Update process which was approved by Mayor and Council on April 27, 1998. The current Plan translates the Starr Pass Master Plan as it was approved in 1992 and incorporates policies which provide for hotel and time share units. The current Starr Pass Master Plan is in conformance with the recently approved Tumamoc Area Plan Update.

2.3.3 Starr Pass Master Plan

The primary goal of the overall Starr Pass Master Plan is to develop the community in an environmentally sensitive way that will complement and enhance the site's natural beauty and environmental features. The current Starr Pass Master Plan covers 926 acres; the addition of the Specific Plan site (197 acres) and the Moussa Property (10 acres) increases the master plan area to a total of 1,133 acres. Within this area, the plan does not propose to increase the maximum number of units from the existing City of Tucson approved Starr Pass Master Plan for 2,100 units. The Master Plan area has increased, yet the maximum development build out remains unchanged; therefore, overall Starr Pass densities are reduced by the addition of this Specific Plan proposal. The unit figure includes units for a 600 room resort, time share units,

apartments, townhomes and single family detached homes. The overall build out density for the current Starr Pass Master Plan plus the hotel site plus Moussa is 1.85 residences per acre (RAC). The density for the current Starr Pass Master Plan as platted is approximately 2.27 RAC.

2.4 Existing Zoning

Current zoning on the property is SR (Suburban Ranch). Suburban Ranch is a low density residential zone that allows approximately 1 residence per 3.3 acres (144,000S.F.).

The property along the east boundary of the site is partially in the City and partially in the County. For both jurisdictions, the adjacent property along the north, south and east boundaries is zoned SR except for a small portion adjacent to the southeast corner of the site which is in the City and zoned R-1 (Residential Zone 1). SR zoning is defined the same for the City and the County at approximately 1 residence for 3.3 acres.

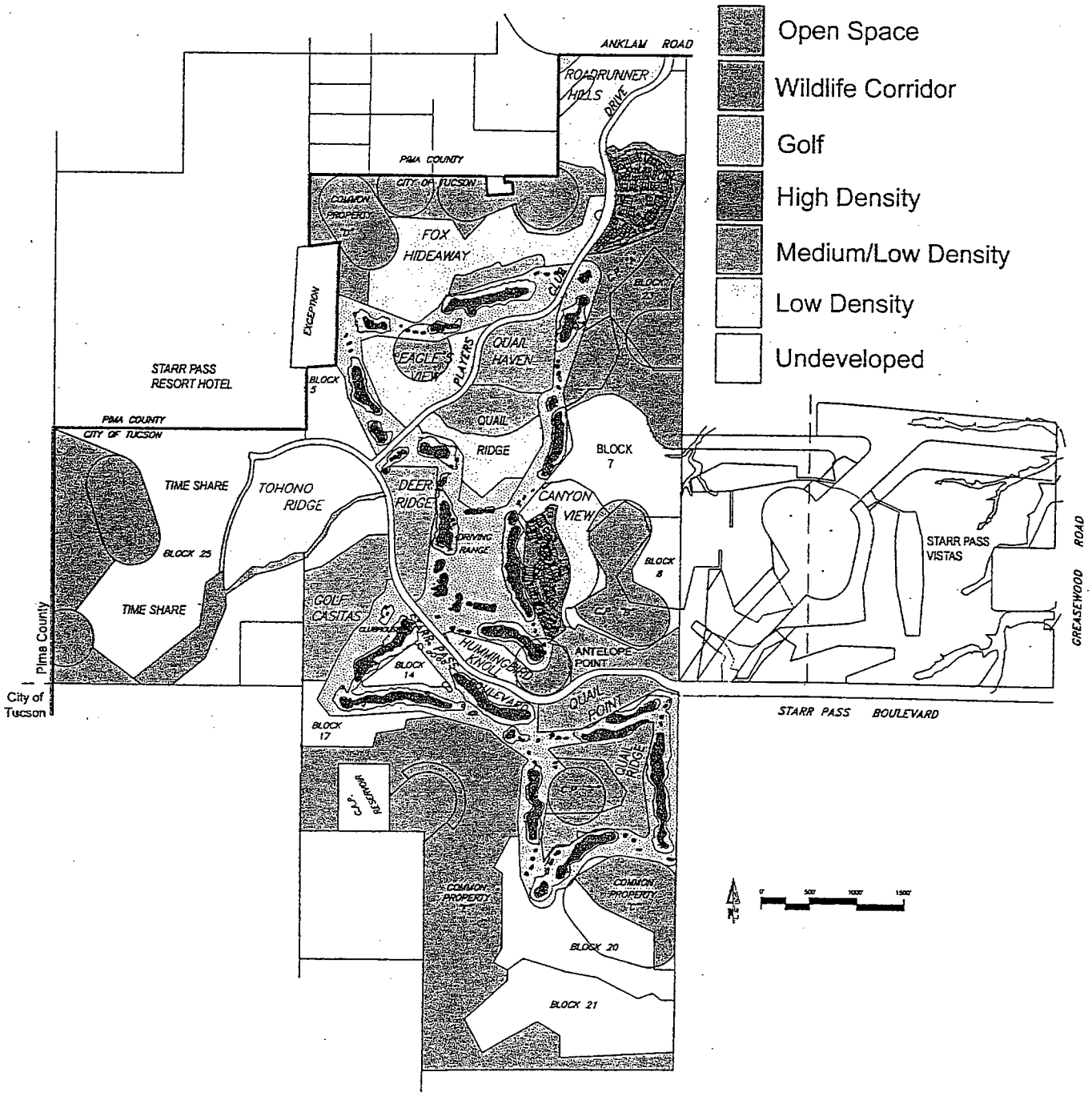
The existing zoning for surrounding properties is graphically shown on Exhibit 2.4-A.

2.4.1 Pima County Zoning

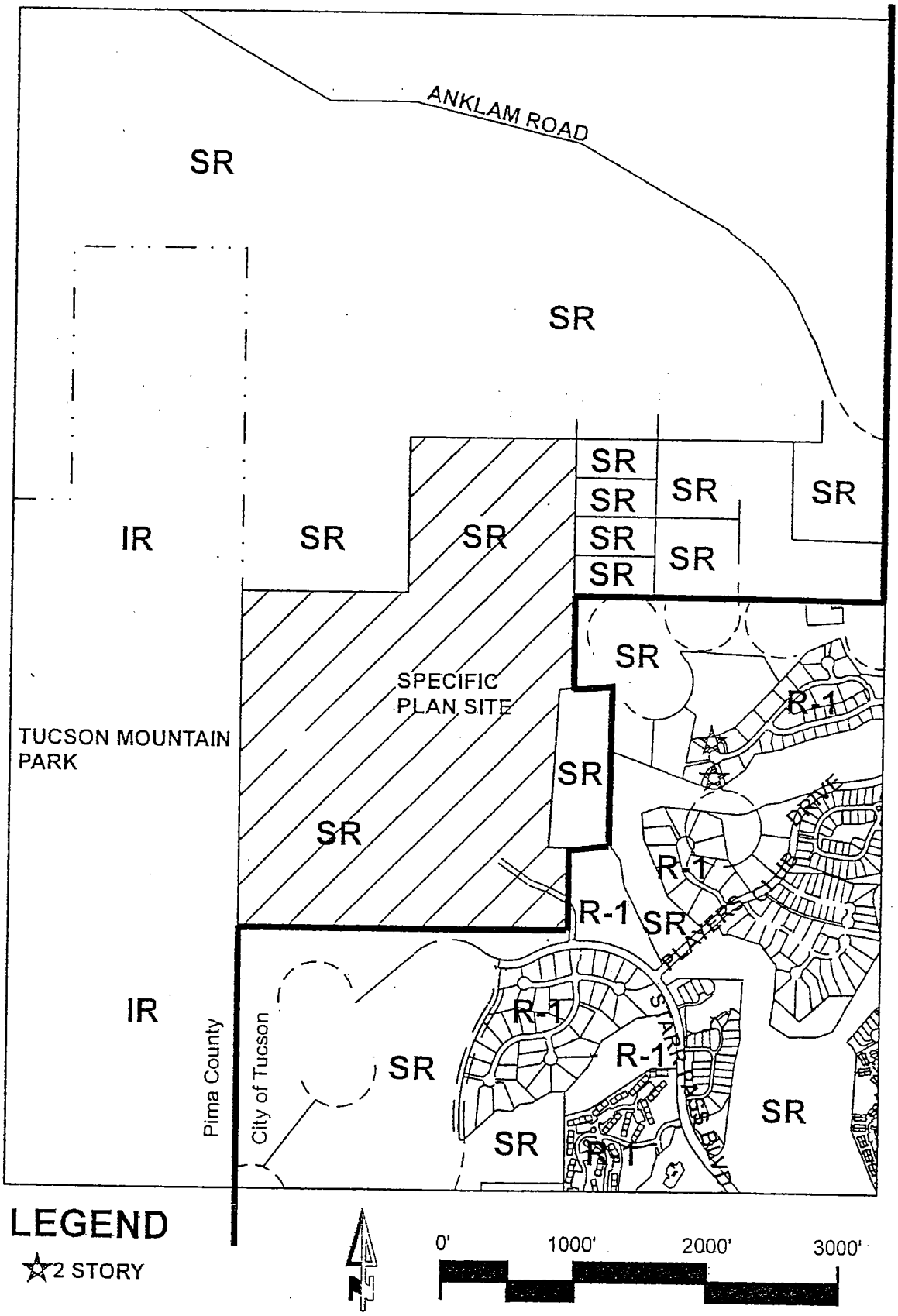
Properties to the west and north of the site are in Pima County and are respectively IR and SR zones. IR is Institutional Reserve and is the designation used for government controlled lands, in this case, Pima County's Tucson Mountain Park. SR is a low density residential zone as previously noted.

2.4.2 City of Tucson Zoning

The east and south site boundaries are those that are adjacent to the existing Starr Pass Development as approved by the City of Tucson. The R-1 zoning allows up to six residences per acre. Proposed changes to the current Starr Pass Master Plan are to down zone the adjacent unsubdivided R-1 zone to the east to SR to allow golf course. The subdivided southern R-1 area (Tohono Ridge) is a large lot, custom home subdivision with lots of approximately 33,000 sq.ft.



Starr Pass Land Use
Exhibit 2.3-B



Existing Zoning
Exhibit 2.4-A

2.5 Topography

2.5.1 Site Characteristics

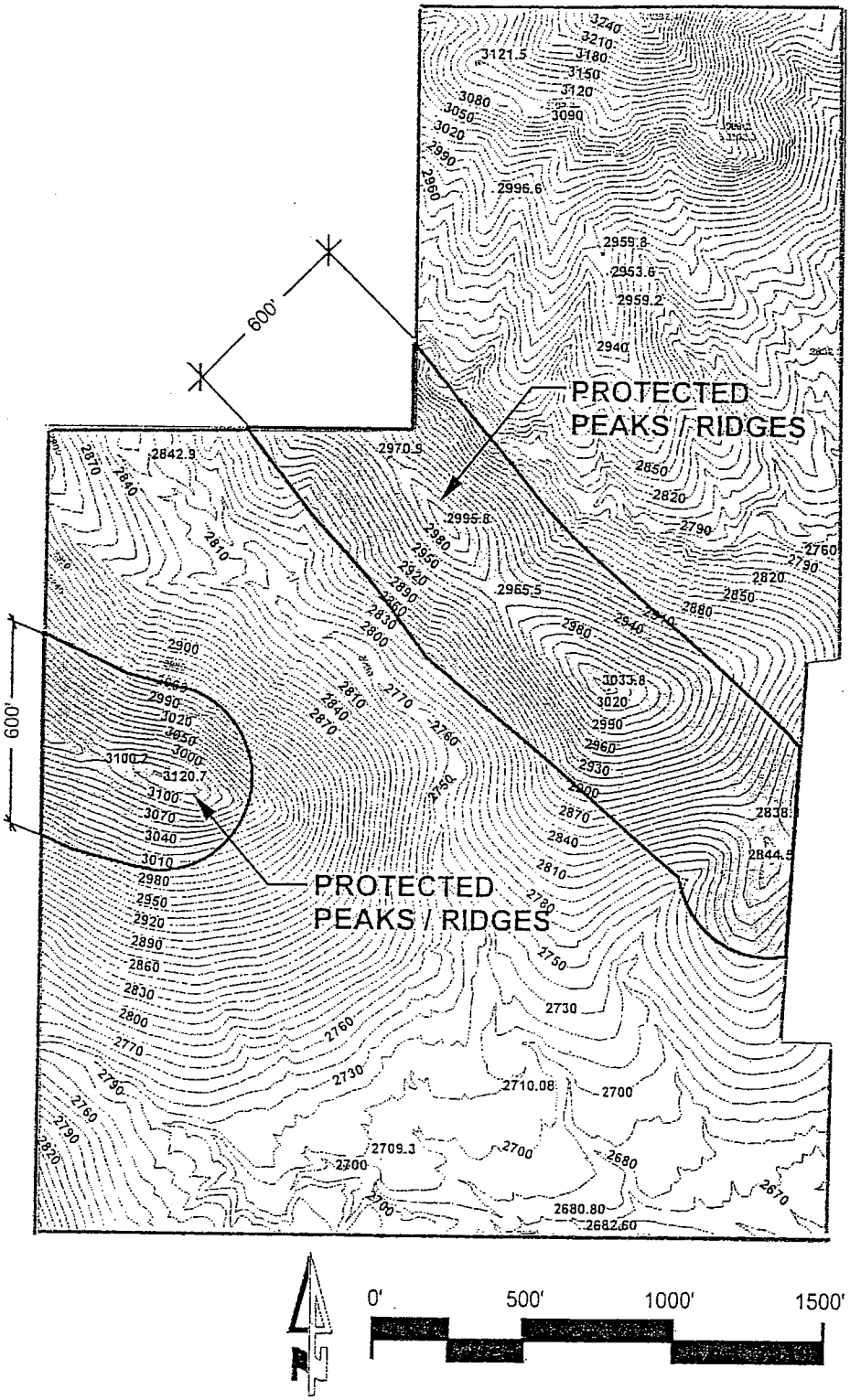
The Anklam Property is transected by two major ridgelines, both of which terminate within the project boundary. Deeply carved natural watercourses lie between and follow the two predominate ridges. Beyond the watercourses, the topography rises to meet the ridges lying outside the project site to the north and southwest. Along the south side of the project, at the base of the two ridgeline slopes, lies the Anklam Wash, the largest watercourse on the site. The two major ridgelines are identified as protected peaks and ridges in Section 18.61.120 of the Pima County Zoning Code and these peaks and ridges are shown on Exhibits 2.5-A.

Steep slopes and ridges are predominant in most areas of the site. Exhibit 2.5-B, Slope Map shows the extent of the 15% and steeper slopes. There are no significant rock outcroppings on this site.

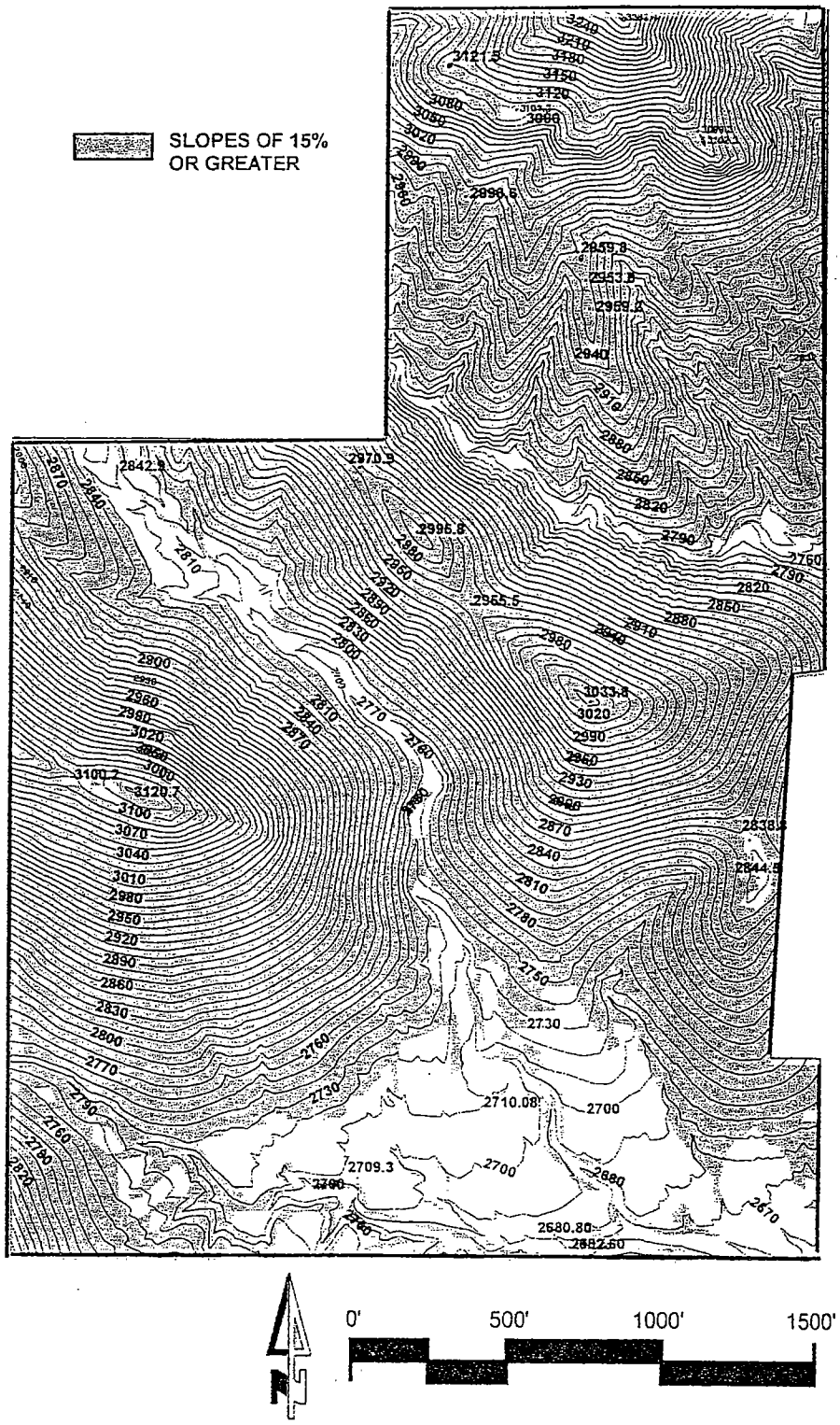
2.5.2 Average Cross Slope

The site has an existing average cross-slope of 35.5%, based upon an area of 197 acres, 304,003 ft. of contour length, and a 10 foot contour interval. The average cross-slope was computed in accordance with the HDZ calculation method identified in section 18.61.030 of the Pima County Zoning Code, where:

$$ACS = \frac{I \times L \times .0023}{A} = \frac{(10)(304{,}003)(.0023)}{197} = 35.9\%$$



Protected Peaks and Ridges
Exhibit 2.5-A



Slope Map
Exhibit 2.5-B

2.6 Hydrology

The Anklam Property is affected by watersheds originating south and west of the site in the Tucson Mountains. These watersheds form the headwaters of the west branch of the Anklam Wash, and drain in a predominantly southeasterly direction through the site. Downstream of the site, the flow turns to the northeast joining the other branches of the Anklam Wash, eventually joining with the Silvercroft Wash, and ultimately the Santa Cruz River. This site is approximately 5.3 river miles upstream of the confluence with the Santa Cruz River.

The Anklam watershed, which encompasses the entire site, is recognized as a balanced basin by the City of Tucson.

2.6.1 Off-Site Watershed

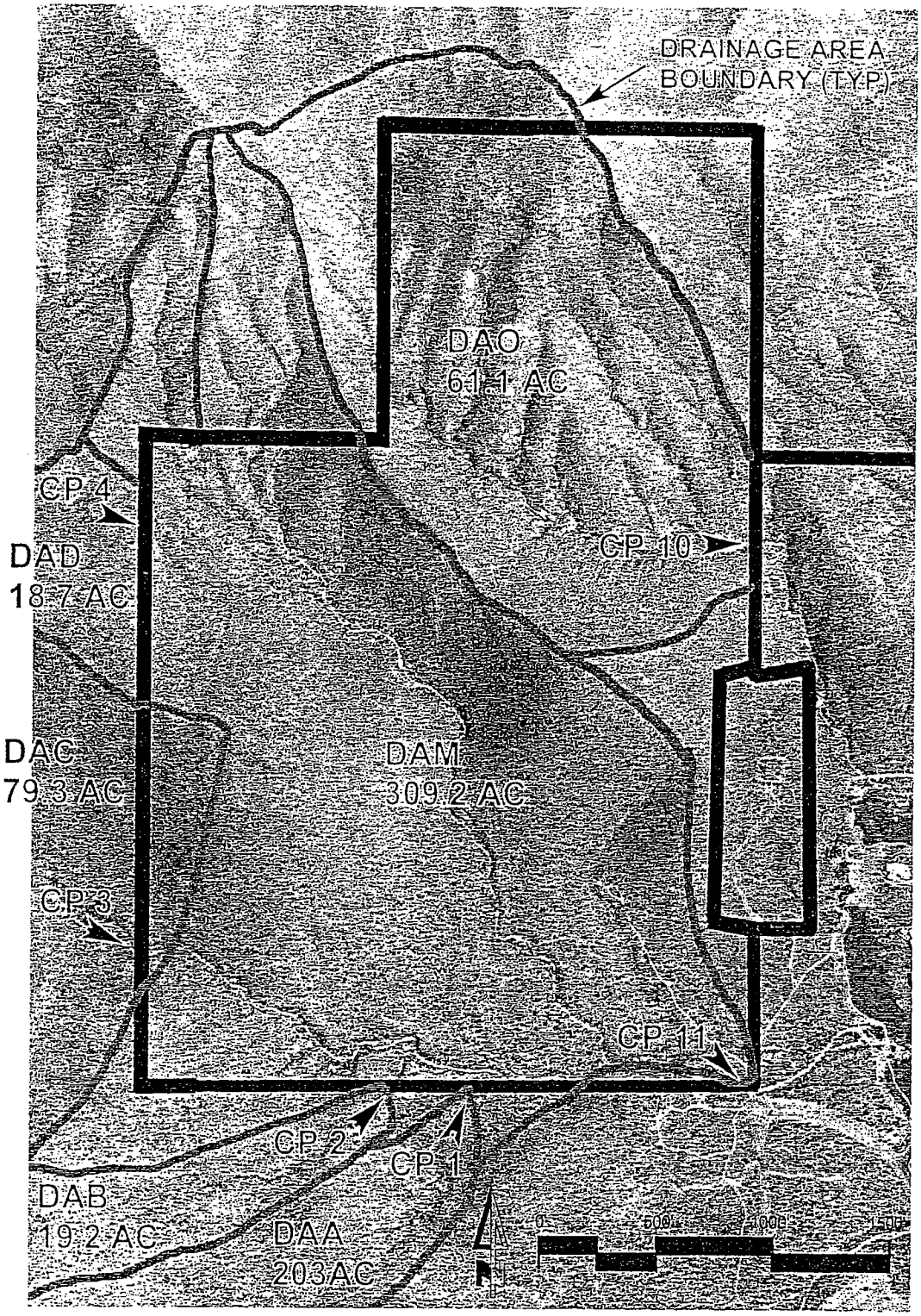
Four main off-site drainage basins with 100-year peak flow exceeding 100 cubic feet per second (cfs) impact the site. They are shown on Exhibit 2.6A as Drainage Area A, DAA Drainage Area B, DAB Drainage Area C, DAC Drainage Area D, DAD. Their concentration points are identified on Exhibit 2.6-A as CP1, CP2, CP3, and CP4. All off-site runoff enters the subject property through natural channels.

2.6.2 Significant Off-Site Features

No significant off-site drainage features have been noted within the watersheds identified and mapped in Item 1 above. All watersheds are natural and have well-defined drainage networks.

2.6.3 Areas and Discharges from Off-Site Watershed

See Exhibit 2.6-A for the four main off-site drainage areas. Concentration Point 1 has a contributing area of 20 acres and a 100-year peak flow of 138 cfs. Concentration Point 2 has a drainage area of 19 acres and a 100-year peak flow of 137 cfs. Concentration Point 3 has a contributing area of 79 acres and the highest off-site 100-year peak flow of 540 cfs. Concentration Point 4 has a contributing watershed of 19 acres and a 100-year peak discharge of 134 cfs. These 100-year peak discharges were computed assuming that the upstream watershed would remain natural, and the off-site desert vegetation densities would remain. This assumption should be valid as the off-site watersheds lie within the Tucson Mountain Park.



DA= DRAINAGE AREA
CP= CONCENTRATION POINT

Existing Off-Site Hydrology
Exhibit 2.6-A

2.6.4 On-Site Hydrology

The limits of the on-site, 100-year floodplain are shown on Exhibit 2.6-B. The most significant section of the floodplain is the main channel of the west branch of the Anklam Wash which runs along the southern boundary of the site. A tributary of the west branch, originating northwest of the site, branches into the west branch of the Anklam Wash just upstream of the southeast corner of the site. An additional floodplain bi-secting the northern portion of the site was identified, however, it confluences with the Anklam Wash downstream of the site.

All runoff traversing the site is contained within natural channels. No sheet flooding occurs and no drainage improvements have altered any channel.

No Federally mapped floodplains are delineated within the limits of the site.

Flows from off-site drainage from CP's 1, 2 and 3 coalesce shortly after entering the property, forming the main channel of the west branch of the Anklam Wash. The watercourse runs parallel to the southern property line of the site. The channel originating from the off-site Concentration Point 4 collects the runoff from the northern portion of the property, passing from the northwest corner to the southeast before confluencing with the west branch upstream of the southeast corner. An additional drainage channel conveying a 100-year peak flow of greater than 100 cfs runs through the northern portion of the site.

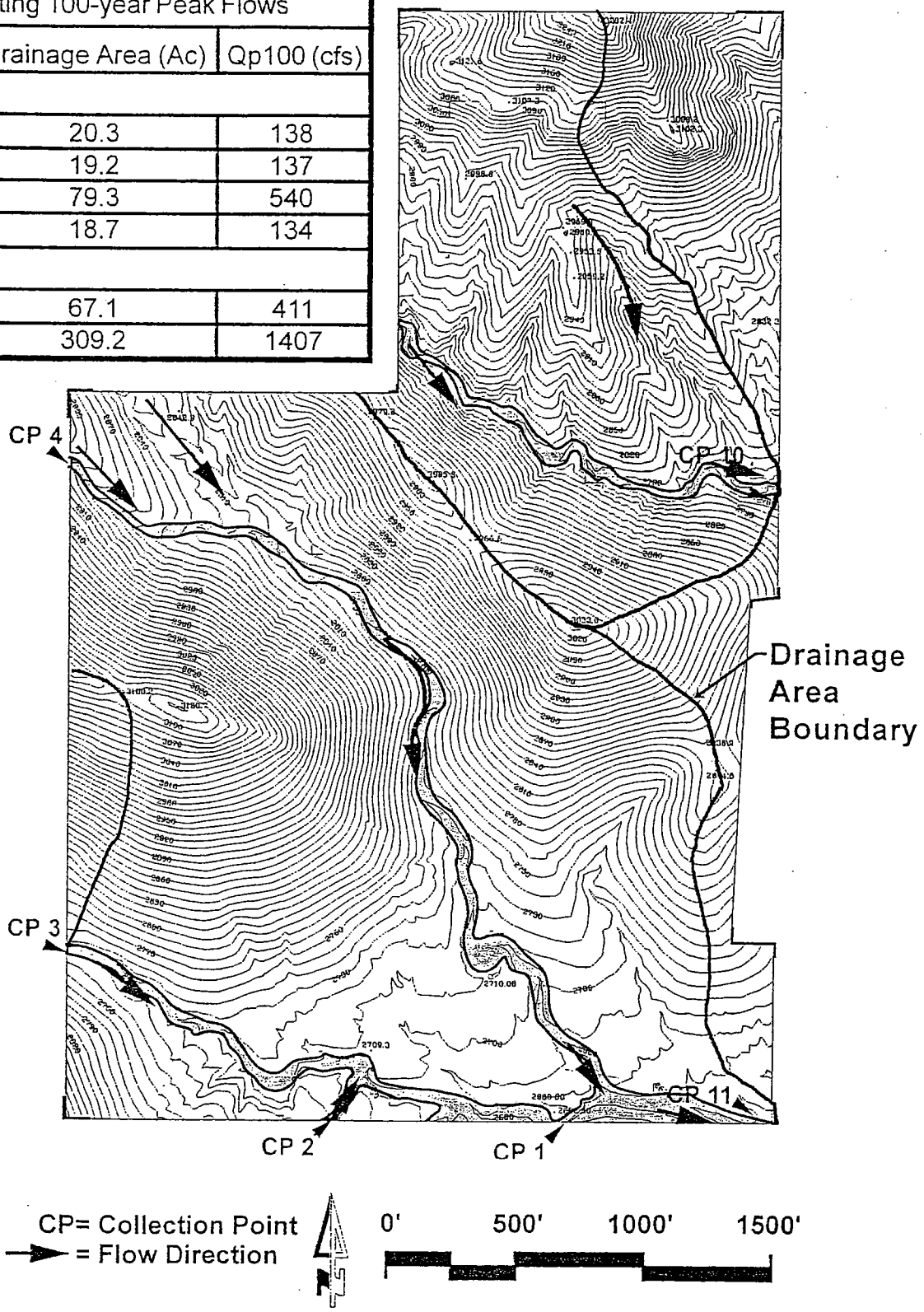
The main channel of the west branch of the Anklam Wash exits the site at the southeast corner with a 100-year peak discharge of 1407 cfs at Concentration Point 11. The northern channel exits the site at Concentration Point 10 with a flow of 411 cfs.

All 100-year peak discharge rates were computed considering the land in its current undevelolped, undisturbed state.

2.6.5 Downstream Property Boundary

All watercourses discharge along the eastern perimeter of the property, at the two major concentration points (CP 10 & CP 11), within the natural, well-defined washes that contain the 100-year peak runoff. No drainage structures currently exist either within the site or on the eastern boundary of the property.

Existing 100-year Peak Flows		
CP#	Drainage Area (Ac)	Qp100 (cfs)
Off-Site		
1	20.3	138
2	19.2	137
3	79.3	540
4	18.7	134
On-Site		
10	67.1	411
11	309.2	1407



Existing On-Site Hydrology
Exhibit 2.6-B

2.7 Vegetation

2.7.1 Vegetative Communities

The vegetation on the project site is catagorized as Upland Sonoran Desert Scrub community. Two subcommunities of the Upland Sonoran Desert Scrub community are the Saguaro-Palo Verde, and Riparian Desert vegetation community. According to the habitat classification system of the Pima County Flood Control District's Floodplain and Erosion Hazard Management Ordinance the on-site riparian vegetation is defined as Xeroriparian Habitat. Reference to the Flood Control District Maps did not show the hotel site to be in the Ordinance Area. The Critical and Sensitive Wildlife Habitat Maps (Shaw Maps) show the site area to be in the Palo Verde-Saguaro Sonoran Desert Community. Class 1 and Class 2 Riparian Habitats as identified on the Shaw Maps cross through the hotel site area.

Class 1 Habitat is defined as habitat which has major extensions of riparian habitat from protected areas. This area on the site refers to the riparian areas that extend from and between the two protected peaks that traverse the site diagonaly in an northwesterly to southeasterly direction. Class 2 Habitat defines the eastern half and northern portion of the site. Class 2 Habitat includes major segments of riparian habitat which are not linked to protected areas. This includes the west branch of the Anklam Wash which is in the flat, low, southern bajada area of the northern site and the wash which features the on-site biological corridor.

2.7.1.1 Upland Sonoran Desert Scrub Community

The entire property is representative of the Upland Sonoran Desert Scrub Community. This general plant community is made up of two plant subcommunities found on the site: Saguaro-Palo Verde and Xeroriparian Habitat.

In general, the Upland Sonoran Desert Scrub Community is dominated by foothills palo verde trees (*Cercidium microphyllum*), ocotillo (*Fouquieria splendens*), and bursage (*Ambrosia deltoidea*). Also included in this grouping was creosote (*Larrea tridentata*), saguaro (*Carnegiea gigantea*), various prickly pear and cholla cacti (*Opuntia spp.*), and acacia (*Acacia spp.*). Mesquite (*Prosopis velutina*) was found along several washes.

2.7.1.2 Saguaro-Palo Verde Community

The saguaro – palo verde plant grouping is technically a part of the Upland Sonoran Desert Scrub Community (Brown et al. 1979 and Brown 1994). However, for the purposes of this submittal, it is treated as a separate vegetative community. Saguaro cacti provide specific habitat for many desert animals. This cactus community is prevalent throughout the site.

2.7.1.3 Xeroriparian Habitat

Xeroriparian habitat has the highest value as wildlife habitat in eastern Pima County (Shaw et al. 1996) and their preservation is important for wildlife conservation. Washes provide many important habitat components for area wildlife, including cover, food, water, and nesting sites. In addition, washes also provide important links across areas and create a system where wildlife can move from one area to another.

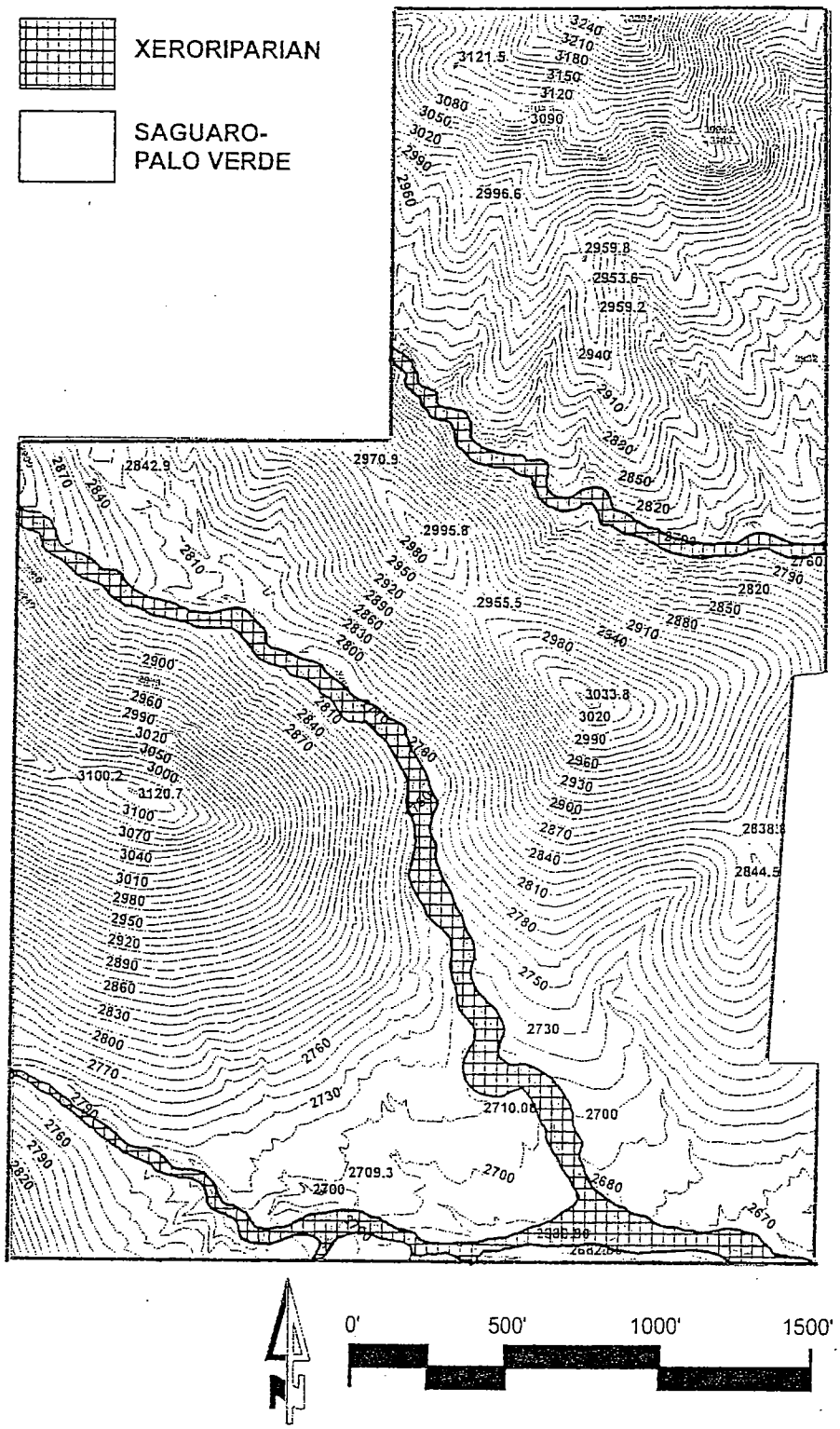
The Xeroriparian Habitat is representative of trees found on dry arroyos and washes. These would include mesquite and palo verde trees, acacias, hackberry, some cacti, and creosote.

The on-site Xeroriparian Habitat contains plant species that are also found in the site's upland areas. The upland plant communities found in the washes are larger, more diverse, and occur at higher densities than their relatives on the upland slopes. The diversity of plants in the xeroriparian areas support a diverse fauna. In addition, the higher volume of vegetation is indicative of greater primary productivity (i.e. production of plant materials that provide food and cover for wildlife) than the surrounding uplands. Desert broom (*Baccharis sarothroides*), fountain grass (*Pennisetum ruppelli*), and Mexican palo verde (*Parkinsonia aculeata*) were also found in some of the washes. Mexican palo verde and fountain grass are exotic species and can grow and propagate quickly and easily, often displacing native vegetation.

The existing on-site plant communities are illustrated on Exhibit 2.7-A.

2.7.2 Threatened or Endangered Visually Prominent and Significant Vegetation

There are three plant species listed as threatened or endangered that might be found in the project area. They are Saguaro, Ironwood, and Pima pineapple cactus. The hotel zone has been field surveyed with particular attention noted to look for the presence of these species. Ironwood and Pima Pineapple cactus were not sighted in this area. Saguaro is common place. Other plants on the Arizona Department of Game and Fish Sensitive List are lyre leaved



Vegetation Communities
Exhibit 2.7-A

twistflower, Tumamoc Globeberry, Thornber fishhook cactus and Pima Indian Mallow. Findings of these species were not noted by plant study field crews or mentioned in the Harris Environmental Biological Linkage report.

2.7.3 Visually-Prominent Cacti

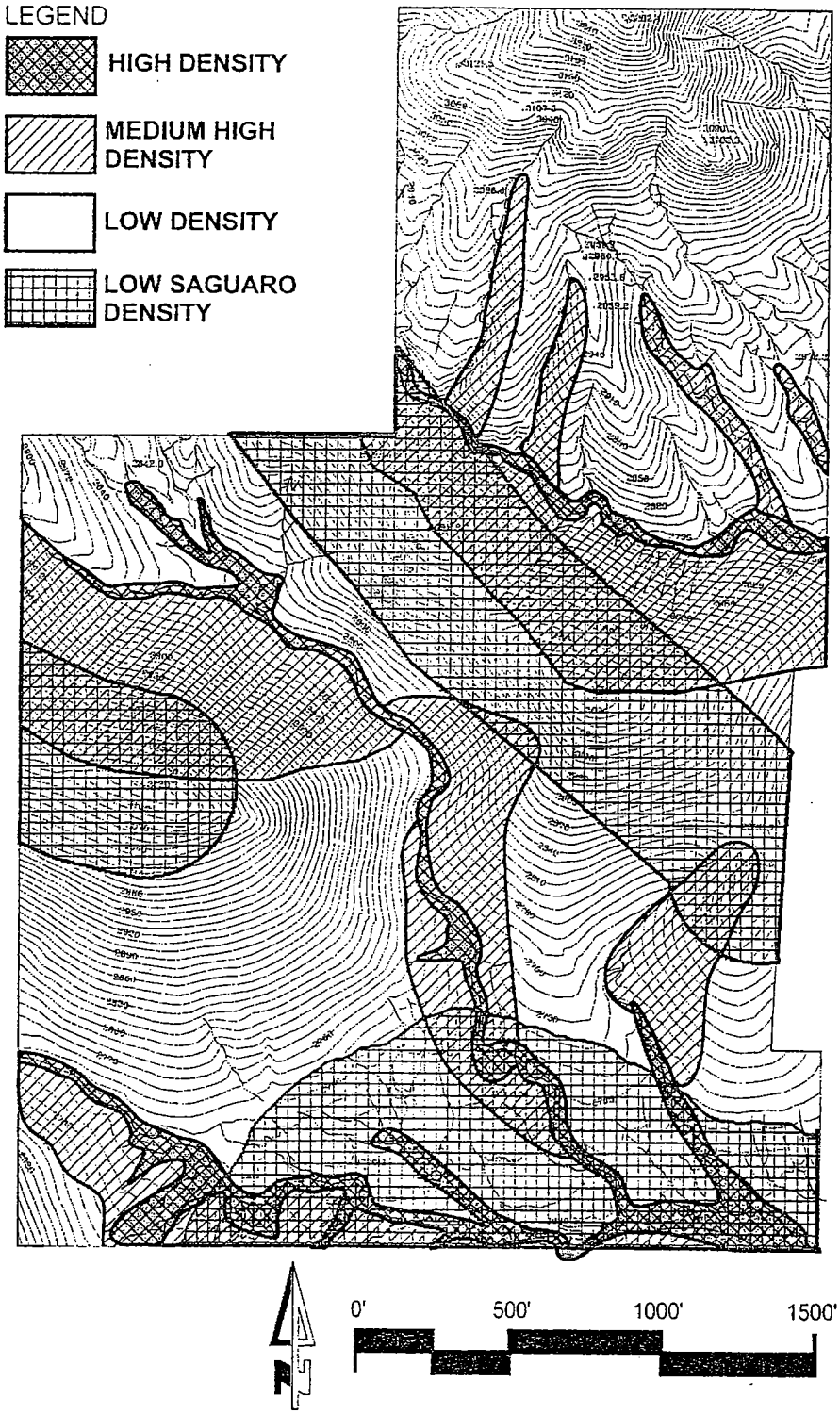
The site contains at least one crested saguaro which is located outside of the proposed disturbance area. The saguaro is a symbol of the Sonoran Desert, especially the Tucson community and is a protected species. Crested saguaros are a rare mutation of the species defined by a large fan-shaped formation at the crown of the main trunk or appendage. Crested saguaros are distinctive and prized for their rarity.

2.7.4 Vegetation Densities

Vegetation density was mapped by field visits and cross-referenced with aerial photographs. Once the vegetation communities of the project area were identified and detailed measurements of plant community structure were completed, then quantitative analysis measurements were defined. An index of total vegetation volume was used to quantify habitat structure. This volume accounts for the three-dimensional nature of a plant community. The size and location of the identified vegetative communities were evaluated to determine the impacts of the development.

2.7.4.1 Methods of Measurement

The methodology used to determine vegetation density volume was a variation of the vertical-line intercept technique. A six (6) meter pole, divided into meter and decimeter sections was used to record the presence of vegetation by species within a 1-dm radius of the pole. Holding the pole vertically at each sample point, the number of decimeters that contained vegetation within a radius of 1 decimeter of the pole ("hits") was recorded by species within each meter layer. The maximum number of possible hits in each meter layer is ten. If more than one species is found within the same meter layer, the number of hits is allocated between the plant species according to the relative dominance of each plant within that meter layer. Twenty points were measured along each transect sampled. The volume of vegetation density was defined in cubic meters per square. These calculations made it possible to quantify the site specific vegetation densities into three ranges of plant coverage classifications. These classifications are described as Low, Medium-High and High-Density areas of plant coverage. They are illustrated on Exhibit 2.7-B.



Vegetation Densities
Exhibit 2.7-B

2.7.4.2 Vegetation Density Categories

2.7.4.2.1 Low Density

The Low-Density classification represents the minimum percentage of plant coverage on the site. Based on the volumetric calculations, any measured ground area on site has a minimum of 50% plant coverage. Therefore, 50% plant coverage is the starting point for determining the plant coverage range categories.

The Low Density plant coverage area is the most expansive category on the site as it defines approximately 70% of the total site area. The Low Density range category is 50%-60% plant coverage. The average plant coverage density throughout this area is approximately 58%.

2.7.4.2.2 Medium Density

The Medium-Low and Medium Vegetation density values between 60% and 80% are not representative of the plant coverage on this site. Therefore, they are not described or shown in the Specific Plan document.

The Medium-High Density area undulates along the wash areas and makes up approximately 25% of the total site area. The Medium-High Density is 80% - 90% plant coverage and the average plant coverage density is approximately 87%.

2.7.4.2.3 High Density

The High Density area includes the vegetation in and directly adjacent to the 100 year floodplain boundary; it accounts for approximately 5% of the total site area. The High Density area reflects the Xeroriparian Habitat.

The High Density is 90% - 100% plant coverage; the average plant coverage density is approximately 91%.

2.7.4.3 Saguaro Density

Four saguaro density classes were defined: 1) No saguaros; 2) Low saguaro density (less than 5 saguaros per acre); 3) Medium saguaro density (5-15 saguaros per acre); and 4) High saguaro density (15-40 saguaros per acre).

The site has significant saguaro coverage. In general, saguaros are found throughout the site and their overall density is high. The areas on-site where there are low density counts of saguaros are in the lower wash areas and on top of the peaks and ridges. These low saguaro density areas are shown on the Vegetation Density Exhibit 2.7-B. All other areas on site have a medium to high-density saguaro count.

2.8 Wildlife

2.8.1 Game and Fish Department Review

A letter from Arizona Game and Fish Department is included as Appendix Two. As indicated in the letter, there are special status species common to the Sonoran Desert that may occur in the area. Species listed in this group have not been sighted on the property, however, should any of these species be found during the construction phase, Arizona Game and Fish Department will be contacted for further conservation assistance and recommendations.

2.8.2 Special Status Species

The sensitive listed animal species are the Great Western Mastiff Bat and the Mexican Free Tailed Bat. The Sonoran Desert Tortoise and California Leaf-Nosed Bat are listed as Wildlife of Special Concern. As noted by Game and Fish, the Desert Tortoise habitat is usually that of rocky higher ground. These areas on-site will be preserved as natural area.

The Pygmy Owl was recently listed as Federally Endangered. A Pygmy Owl survey was performed by Harris Environmental in accordance with the current standards and no Pygmy Owls were heard or observed. Harris Environmental concluded that Pygmy Owls do not exist on the property. (see Appendix 3)

2.8.3 Common Wildlife

The site provides food and shelter for a wide variety of wildlife. Common wildlife sighted in the area include deer, coyotes, javelinas, bobcats, quail, doves, hawks, roadrunners, cactus wrens, ground squirrels, jack rabbits, and cottontail rabbits.

2.8.4 Significant Habitat Areas

The Harris Environmental Group did an Environmental Study to determine locations of significant environmental habitat and migration patterns of wildlife which link Tucson Mountain Park to the University of Arizona Desert Laboratory on Tumamoc Hill. Their study identified three biological corridors which traverse the Specific Plan site in a east-westerly direction. These corridors are part of the overall biological linkage system. The corridors vary in width and are lined by a biological corridor buffer. One on-site biological corridor is located in the northern 1/3 portion of the site; another includes and follows the west branch of the Anklam Wash. The middle corridor follows a wash area which traverses diagonally through the site.

The Shaw Map shows the Anklam property to contain Class 1 and Class 2 Wildlife Habitat. See Section 2.7 Vegetation for the description of these habitats. As indicated by the Harris Environmental Biological Corridor Study and on the Shaw Map, wildlife movement corridors traverse the site.

2.9 Soils

Soil testing for this site has not been done at this time. A Geotechnical Soils Report shall be completed for submittal at the time of development plan submittal.

Soil testing for septic use is not applicable for this project.

2.10 Viewsheds

The valleys, foothills and mountainous topography throughout Starr Pass allows limited views of the site from most points off-site looking on-site. Exhibit 2.10-A, Photo Viewpoints shows the location points where photos were taken. The photographs are numbered and labeled to correspond to the photo viewpoints.

2.10.1 Primary Off-Site to On-Site Viewsheds

Primary viewsheds are from adjacent off-site locations and are characterized by their full encompassing view of the site. They may be described by their high visibility because they have a foreground, middleground and background. There are three adjacent off-site locations where full expansive on-site viewsheds occur. They are: 1) from the south property line looking across the valley to the north; 2) from the southwest corner of the site in Tucson Mountain Park looking northeast across the site; and 3) from the northwest corner of the site looking southeast down the valley framed by peaks. Other adjacent views looking from off-site to on-site are blocked by foothills and peaks and ridges.

2.10.1.1 Adjacent South Looking North

The southern portion of the site is similar to a box canyon where foreground views from the south property line slope downward into the flat west branch Anklam Wash valley, then rise to the middleground of the saguaro covered foothills leading on to the upper bajada area, and finally find the background, distant, views of the mountain peaks and ridges. This view, although all encompassing, is shortened by the nearness of the mountain peaks and ridges. It is shown on Exhibit 2.10-A, Photo Viewpoints, Panorama Photograph 4-7

2.10.1.2 Southwest Looking Northeast

Here again, the foreground view is of the west branch of the Anklam Wash, the middleground is of the saguaro foothills, and the background is of the mountain ridges line which runs diagonally from northwest to southeast. The viewsheds are very similar, only taken from different view angles. See Exhibit 2.10A, Photo Viewpoints Panorama Photograph 1-3.

2.10.1.3 Northwest Looking Southeast

This viewshed is very narrow but is distant. It follows down the wash valley and is framed by undulating ridges on both sides. The foreground is the same as the middleground and background the only difference being distance. This viewshed is of a meanderring canyon and is shown on Exhibit 2.10A as Viewpoint A. There is no photo of this view angle.

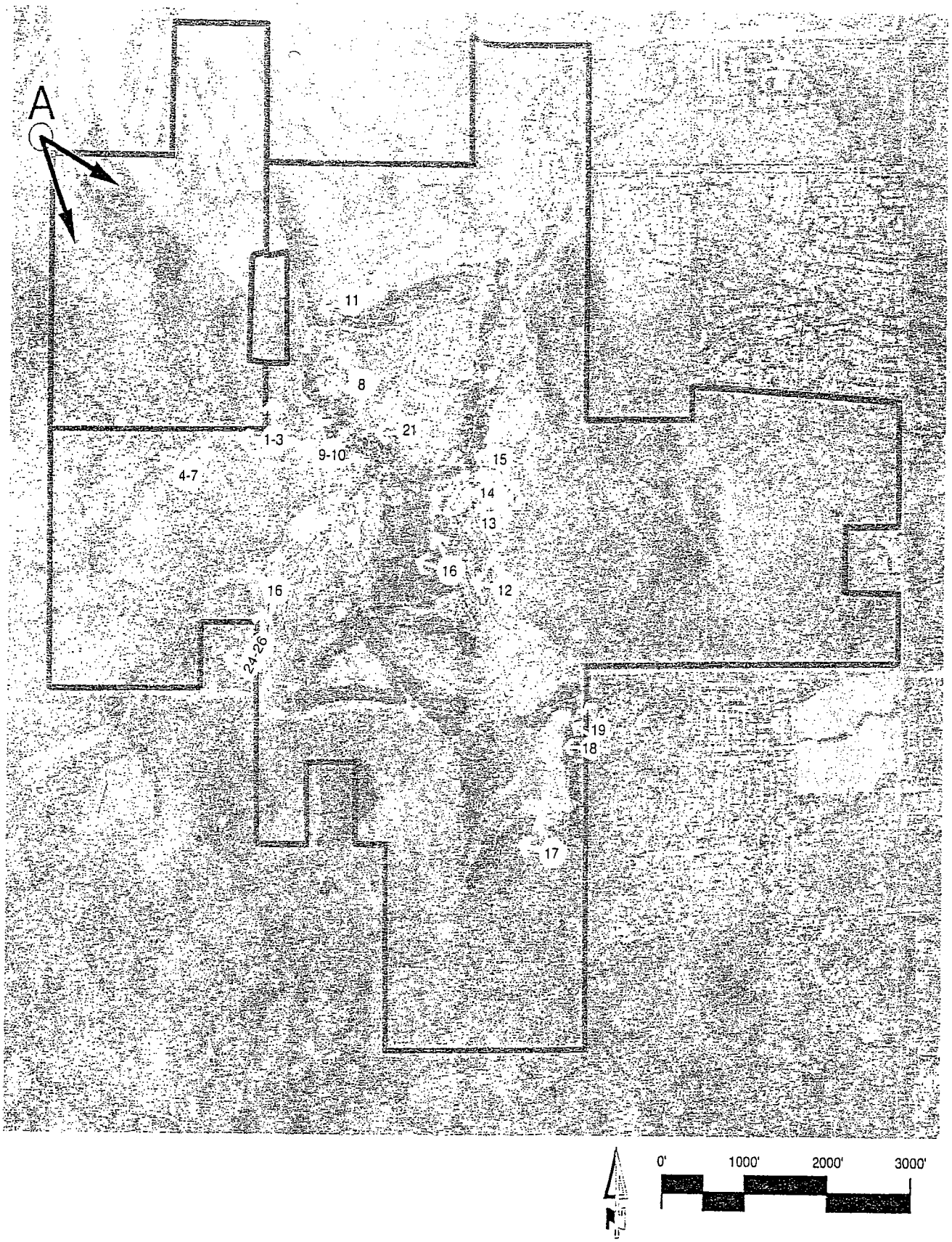
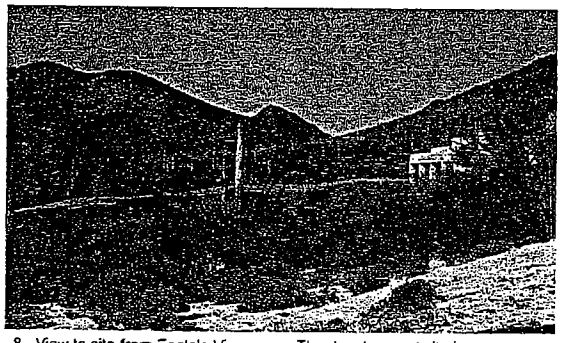


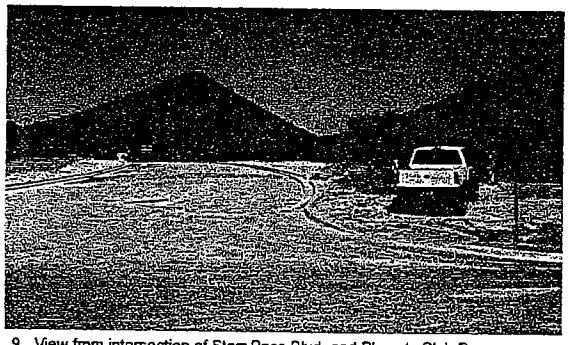
Photo View Points
Exhibit 2.10-A

Panorama A (1-3). This view into the site from the southeast corner approximates that which one would see driving to the resort. The development area is readily visible, as are the surrounding peaks

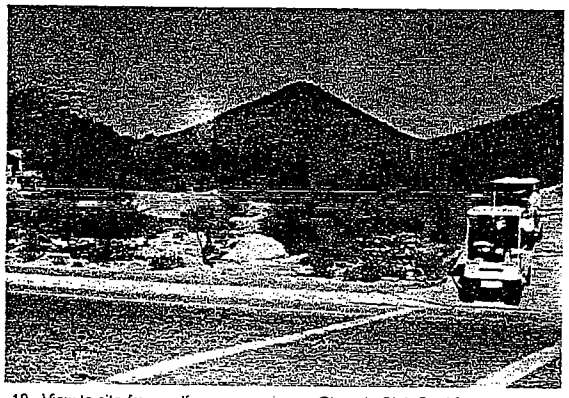
Panorama B (4-7). This view from a low peak immediately south of the site shows the development area in the forground, two prominant peaks in the middle ground, and other Tucson Mountain peaks in the background.



8. View to site from Eagle's View area. The development site is blocked from view by a slope in the middle ground. Tucson Mountain peaks remain a prominant feature.

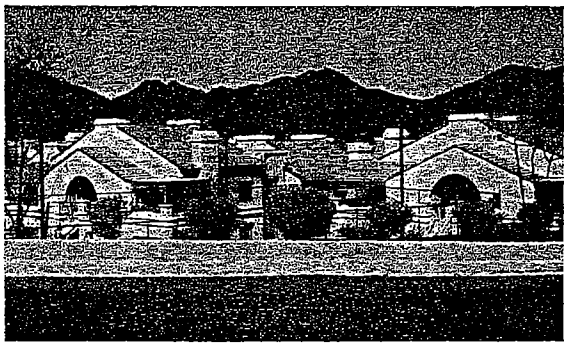


9. View from intersection of Starr Pass Blvd. and Player's Club Dr. Development area is hidden from view by landform in middle ground. Two on-site mountain peaks form background views.



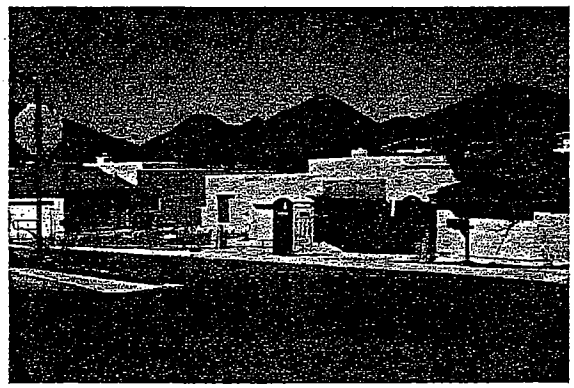
10. View to site from golf court crossing on Player's Club Dr. View of development site blocked by landform. On site peaks form background views.

11. View to site from Fox Hideaway. Site is completely blocked from view.

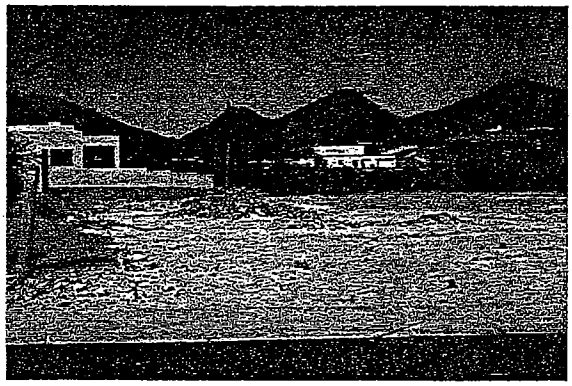


12. View to site from Bill Martin Dr. adjacent to Starrview apartments. Views to mountain peaks only, due to landforms and development.

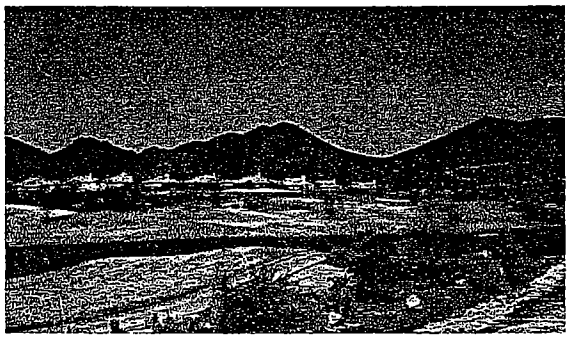
13. View to site from Bill Martin Dr. adjacent to Starrview apartments. Views to mountain peaks only, due to landforms and development.



14. View to site from Bill Martin Dr. Views to mountain peaks only,due to landform and development.

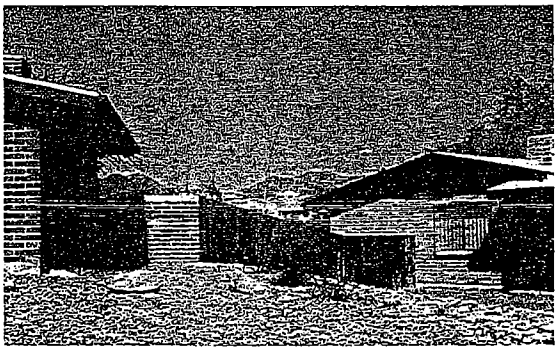


15. View to the site from Bill Martin Dr. near Canyon View. Most of the development site hidden from view due to landform.

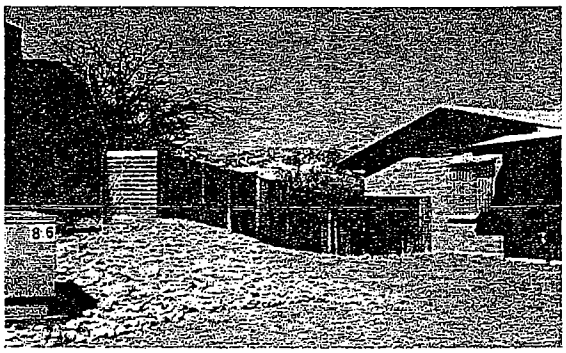


16. View to site from Starrview apartments. Primary views of site are on-site mountain peaks. View of development site largely hidden by buildings in middle ground and landform.

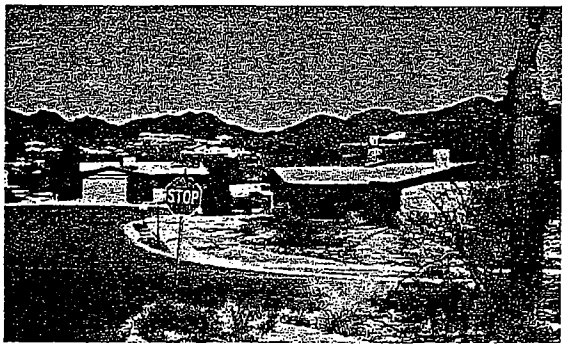
17. View to site from Quail Hollow. Only views of site are mountain peaks.



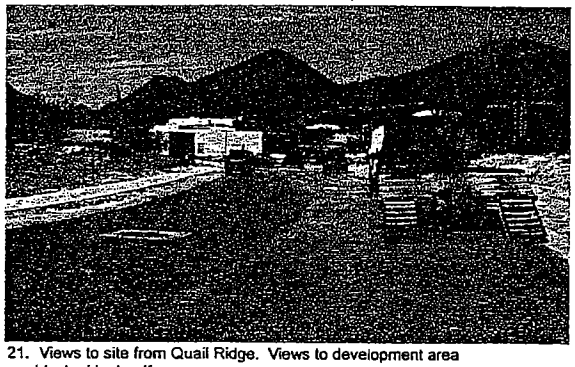
18. View to site from Lavonne Way in Tucson Park West. Only mountain peaks are visible.



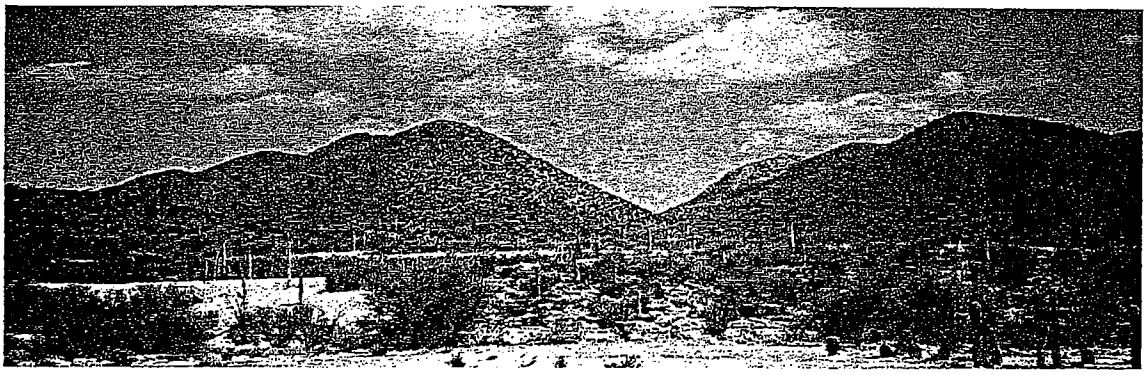
19. View to site from Lavonne Way in Tucson Park West. Only mountain peaks are visible.



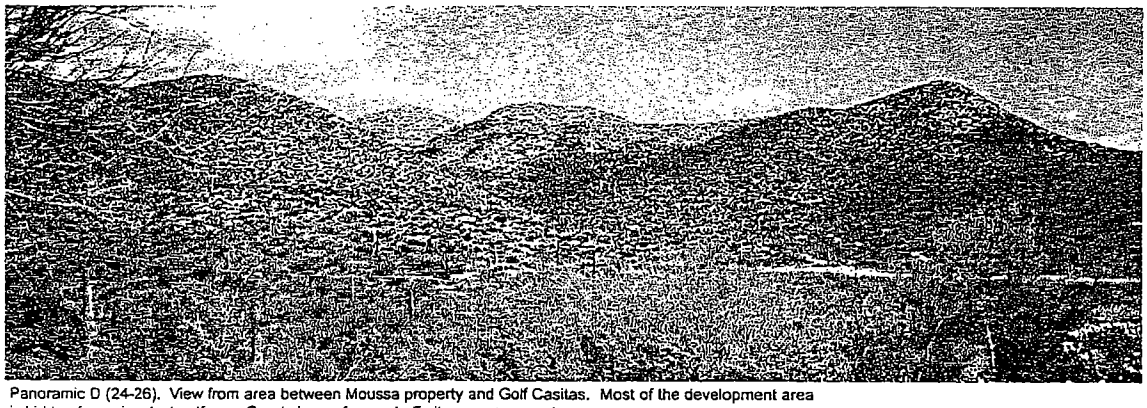
20. View to site from Desert Crest and Shannon Rd. in Tucson Park West. Only mountain peaks are visable.



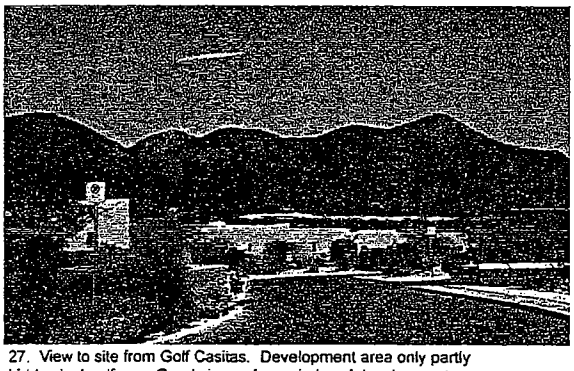
21. Views to site from Quail Ridge. Views to development area are blocked by landforms.



Panorama C (22-23). View from open area immediately north of Golf Casitas. On-site peaks provide strong middle ground views. Development area is blocked from view by landform.



Panoramic D (24-26). View from area between Moussa property and Golf Casitas. Most of the development area is hidden from view by landform. Good views of on and off-site mountain peaks.



27. View to site from Golf Casitas. Development area only partly hidden by landform. Good views of remainder of development area and mountain peaks.

2.10.2 Secondary Off-Site to On-Site Viewsheds

These viewsheds are from properties 1 to 3 miles away from the south & southeast site boundary. Depending on the hills and ridges throughout Starr Pass, these view angles may include just the background or a combined view showing the middle ground and the background.

2.10.2.1 From Golf Casitas Looking North

This is a full view of the site but the Anklam Property is in the distant background. This is a long distant view that is possible because the casitas are on a hill. The foreground is of casitas and a valley to the north, the middleground is of a ridge between the Casitas and the Anklam Property then finally in the far distant background is the Anklam site. Visible is its valley and then the rise of the mountain peaks and ridges. This view angle is shown as Photograph #27.

2.10.2.2 From Eagle's View Looking West

The Anklam Property is in the middleground of this viewshed. Long views to the northeast and northwest are blocked by a ridge that, when looking in that direction, becomes the foreground of the view. This is the view looking west up the west branch Anklam Wash valley. This view direction follows the west branch Anklam Wash and then ends off-site, west into the Tucson Mountains. See Photograph #8.

2.10.2.3 Intersection of Players Club Drive and Starr Pass Boulevard Looking West

This viewshed shows the middleground, foothills-upper bajada area, then finds the distant view of the higher peaks and ridges on-site. See Photograph #'s 9-10.

2.10.2.4 Anklam Road Looking South

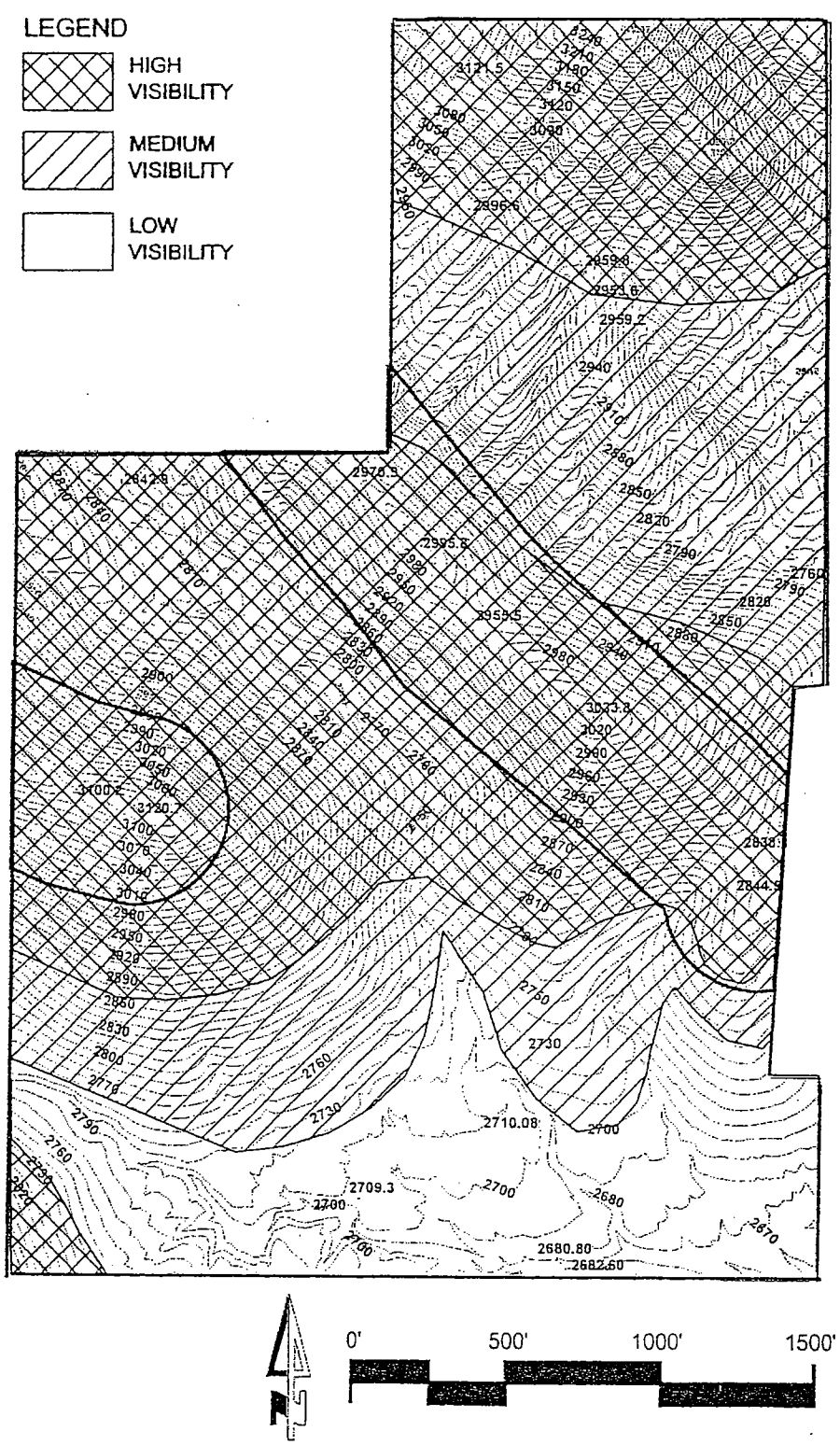
The foreground of the site from this direction is hidden from the road. The only visible distant views into the site are those of the higher peaks and ridges.

2.10.3 High, Medium and Low Visibility

An analysis of the areas of high, medium and low visibility within the site as viewed from the surrounding off-site locations was performed following two methods. First, the surrounding topography was analyzed to determine how existing topography screens or opens up views to the subject property. By reviewing the general topography of the property and then making on-site assessments as to the extent of view penetration, various levels of visibility were determined.

Existing vegetation and its screening properties were also considered.
Second, an on-site to off-site visual analysis was performed as a doublecheck. Off-site views were examined at critical points along the perimeter as well as from prominent points within the site. If an off-site area is easily seen from a point on-site, that point on-site will be easily seen from the off-site property. This visual analysis concept proved most useful for analyzing view impacts of areas slated for future development where road access was not available for off-site checks.

High visibility on-site areas are defined as those areas that can be seen from the most areas off-site. The on-site features that have high visibility are the mountain peaks and ridges. The areas of medium visibility from off-site view angles are the foothills-upper bajada, saguaro covered areas. The low visibility areas are the flat washes and valleys. (See Exhibit 2.10-B)



Site Visibility
Exhibit 2.10-B

2.11 Traffic

Anklam Road is the only major scenic route within one mile of the project site. Anklam Road, in this area, falls under both the City of Tucson and Pima County jurisdictions as an arterial street with a scenic route designation. In the County, per their major streets and routes map, Anklam Road has a future right-of-way width of 150 feet; in the City of Tucson at the exit point from Players Club Drive the existing right-of-way is also 150 feet. The two City of Tucson streets that serve the project, Players Club Drive and Starr Pass Boulevard (within Starr Pass Development), have a continuous 62 foot right-of-way. Both of these streets are posted at 25 MPH and have a minimum of one travel lane with bike lanes in each direction and pedestrian ways set back from the curbs.

The original Traffic Study for the Starr Pass Development was approved by the City of Tucson in 1985 and was based on a projected development of 2,187 units. The traffic analysis included traffic counts that would accommodate a 600-room hotel with casitas. The updated Traffic Study as submitted with the Specific Plan, shows that traffic volumes for current and future planned development for Starr Pass are less than the original traffic volume projections.

The original report showed traffic volumes to be anticipated at a total of 26,400 ADT (Average Daily Trips) and the current Traffic Study predicts the maximum ADT at 20,770 ADT's. This reduction is due in part to changes in land use, the use of new ITE (Institute of Transportation Engineers) trip generation rates and the net reduction in the planned density of the development. The proposed development for Starr Pass Vistas was also included in the traffic calculations. Even with the inclusion of Starr Pass Vistas, the future traffic volumes at build-out are considered to be less than what the original Traffic Study perceived. The updated traffic report has been verbally approved by the City of Tucson (see letter in Appendix Four) and fulfills the Pima County requirements.

2.12 Sewers

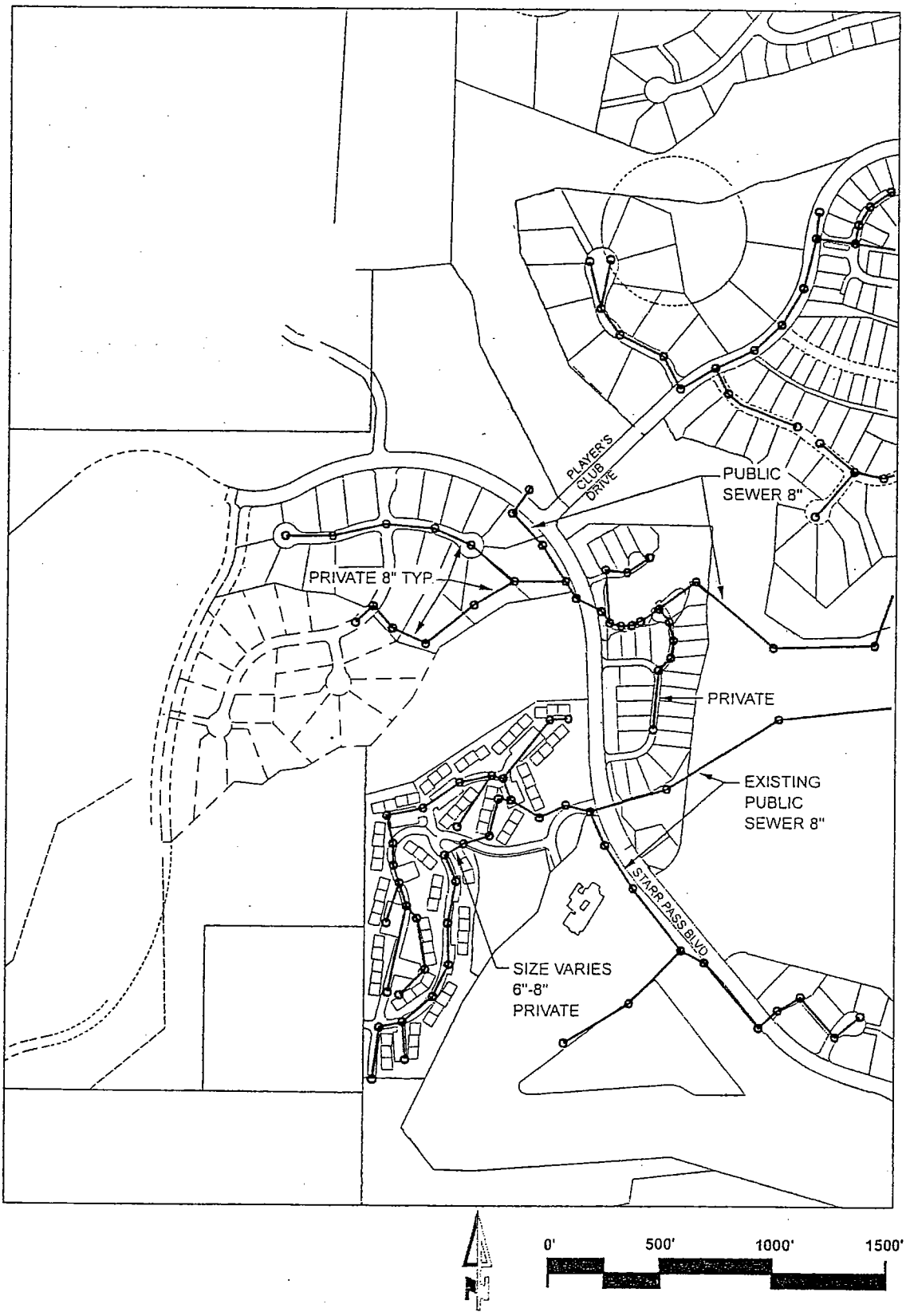
2.12.1 Capacity Response Letter

Pima County Wastewater Management has stated that there is capacity for this proposed development in the downstream sewerage system.

A capacity response letter from Pima County Wastewater Management is included in Appendix Five.

2.12.2 Existing Off-Site Sewers

There are existing sewer lines in the adjacent areas which serve the surrounding residential subdivisions of Starr Pass. These subdivisions are known as Tohono Ridge, Eagles View and Fox Hideaway and follow along the eastern boundary of the property. (see Existing Sewer, Exhibit 2.12-A for their locations)



Existing Sewer
Exhibit 2.12-A

2.13 Schools

The Starr Pass Resort Hotel is a commercial use supporting tourism; therefore, the development will have no effect on the enrollment or the access to any of the neighboring schools. Three schools exist within a 2 mile radius of the proposed development site. They are within the Tucson Unified School District, as outlined below. Their locations are shown on the Location Map, Exhibit 2.1-B.

- Tolson Elementary School is 1.5 miles east of the proposed development site on Greasewood Road;
- Maxwell Middle School is 1.5 miles north of the proposed development site on Anklam Road; and
- Cholla High School is 2 miles est of the proposed development site on Starr Pass Boulevard.

2.14 Recreation and Trails

Regionally, this area is rich in parks, recreation and trails which is partially due to the site's close proximity to the Tucson Mountain Park. In addition, there are many activities and facilities serving the community in the area with sports fields, fishing, tennis courts, basketball courts, picnic areas, swimming pools, hiking, biking, orienteering grounds and golf.

2.14.1 Off-Site Parks and Recreation Areas

Saguaro National Park (West) – is northwest of Starr Pass and is approximately 10 miles by vehicle to the Park Entrance. The park encompasses 24,034 acres and offers a visitor center, hiking trails, picnicing and a scenic loop trail for vehicle use.

Tucson Mountain Park - is adjacent (west) of Starr Pass. The park is approximately 21,000 acres and offers several trails and activities. Some of the recreational activities are biking, hiking, camping, picnicing and sightseeing.

- *Old Tucson* - a wild west theme park with live action entertainment, interactive educational shows, games, rides, shops and gunfights. It is located approximately 5 miles west of Starr Pass.

- *Arizona Sonoran Desert Museum* - is a 20 acre museum that features desert plants and animals in re-created natural habitats. The museum is approximately 7.5 miles west of Starr Pass.

- *Archery Range* - There is an archery range 5.5 miles west of Starr Pass between Old Tucson and the Arizona Sonoran Desert Museum. There is also a rifle range which is approximately 3 miles southwest of Starr Pass on the west side of the Tucson Mountains.

Kennedy Park - is a City Park that is located approximately 3 miles southeast of the proposed development. The park has a fishing lake, picnic ramadas, outdoor fiesta area, multi-use courts without lights, swimming pool, little league baseball fields with lights, soccer field without lights, tennis courts without lights and grass volleyball courts. Kennedy Park is approximately 1/4 mile east of Kennedy Park Trailhead which provides access to Tucson Mountain Park.

Archer Community Center - is a recreational facility which provides both indoor and outdoor facilities. It is located just south of Cholla High School on La Cholla Boulevard. City of Tucson Parks and Recreation Department offers a variety of classes for both youth and adults at the center. Archer center is well used by the community and has a gymnasium, multi-use courts, meeting rooms and classrooms.

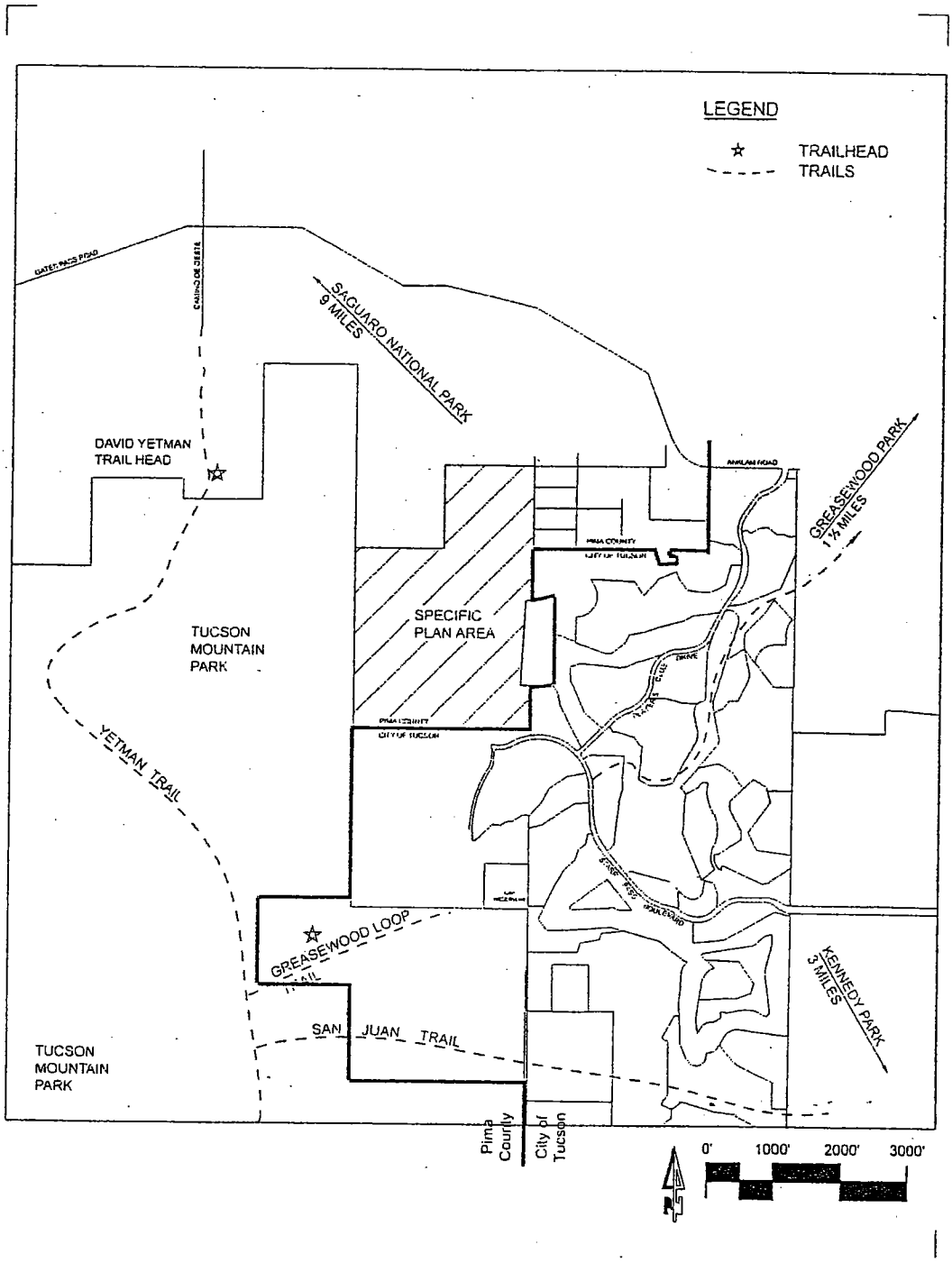
Greasewood Park - is a City Park that is located approximately 1-1/2 miles northeast of the proposed development site. The park has trails and is the base facility for the Tucson Orienteering Club, Greasewood Loop trail connects Tucson Mountain Park with Greasewood Park.

2.14.2 Trail Access Points

The *Greasewood Loop Trail* connects Greasewood Park to Tucson Mountain Park and follows the washes and system through the Starr Pass site. This trail was originally adopted by the Board of Supervisors in 1989. Later the loop was revised and re-adopted by Pima County as Trail 129 of the Eastern Pima County Trails System Master Plan in September 1996.

Exhibit 2.14-A illustrates the locations of the parks, recreation areas and trails located in the vicinity of Starr Pass.

The Greasewood Loop Trail follows Camino de Oeste Wash and Anklam Wash and is recreationally used by walkers, hikers, and equestrians. This trail traverses through Starr Pass along the washes and crosses some roadways. The trail begins 3/4 of a mile south of Starr Pass at the Tucson Mountain Park boundary and heads in a northeasterly direction connecting Greasewood Park via an El Paso Natural Gas Utility easement. The El Paso Gas Natural Easement is considered a major regional trail corridor and is used by pedestrians/equestrians and mountain bikers. The El Paso Natural Gas Easement trail links Pima Farms Road to Congress Street. Starr Pass Development is approximately 5-6 miles west of this Congress Street connection.



Existing Trails
Exhibit 2.14-A

2.14.3 Regional Trail Development

Some of the trails in this region that are on the east side of Tucson Mountain Park, west and southwest of Starr Pass are:

- Yetman Trail - Trailhead convenes at Gates' Pass to the North. Trail follows approximately ½ mile west of the Anklam property, and connects to the Greasewood Loop trail. This combined trail begins at the unimproved Starr Pass Trailhead, which provides hikers and mountain bikers access to Tucson Mountain Park. The trail continues south, southwest and eventually intersects with Kinney Road.

- Existing Starr Pass Trail - Trailhead is located southwest of the Starr Pass Boundary in Section 19. Access to the trailhead is provided through Starr Pass Development.

- Kennedy Park Trail - Trailhead is 1/4 mile west of La Cholla Boulevard. This is a feeder trail which runs west for approximately 3 miles then connects to the Starr Pass Trail. Kennedy Park Trail runs east and west and is about 3 miles south of Starr Pass.

- San Juan Trail -

2.15 Cultural Resources

An archaeological record check and field survey has been completed by Cultural and Environmental Systems. A report summary of the archaeological field survey has been included in Appendix Six.

A copy of the report mapping the archaeological site locations was submitted to Pima County Cultural Resources.

The field survey site data has been recorded with the Arizona State Museum. At this stage of field work, the data shows no indication that the historic findings will have an impact on hotel site construction. An archaeological mitigation plan for further site study may be required prior to hotel construction.

2.16 Air Quality

This project is not an industrial project and will therefore not need a wind flow pattern report.

2.17 Site Constraints

The Composite Map shows the cumulative effect of the existing site constraints. The existing site constraints illustrated on Exhibit 2.17-A are as follows:

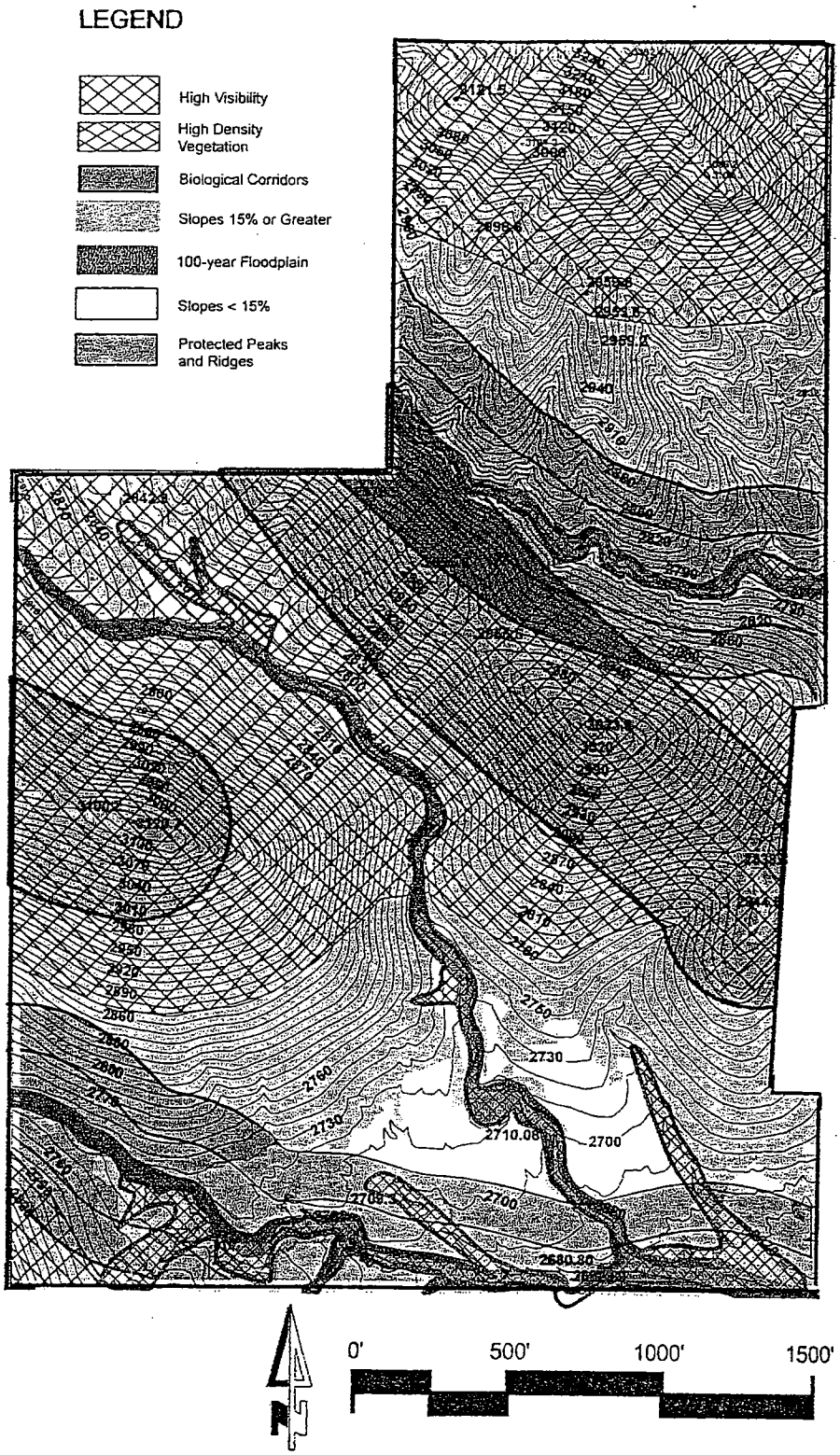
- Most of the site has slopes greater than 15%. Most of these areas limit development. There are two areas of peaks and ridges on-site that are protected from development within a horizontal distance of 300 feet per the Pima County Hillside Development Zone Ordinance. Based on topogrphy, the flat lower bajada area, following east and west along the north side of the west branch of the Anklam Wash, is the only area where development can realistically occur.

- The site features three wash areas. The Pima County Floodplain Ordinance prohibits development within the 100-year floodplain unless approved mitigation methods plans are implemented.

- There are three biological corridors, per the Harris Environmental Study that traverse the site. They follow the Xeroriparian Habitat areas. Development should be designed to maximize where possible, the wildlife linkages through the biological corridors.

- The overall site has a moderate to high density of Saguaros. The only portion of the site with low saguaro count is on the flat lower bajada xeroriparian area. The saguaros are prolific on the foothills and south facing mountainsides. Disturbed area should be limited to the flat lower bajada xeroriparian area where possible. Where possible, saguaros should be removed from disturbed areas and replanted.

- From off-site view sheds, high visibility areas are the site's mountains, peaks and ridges. Development design must respect and blend into the natural topographic background on-site.



Composite Map
Exhibit 2.17-A

3.0 SPECIFIC PLAN LAND USE PROPOSAL

3.0 SPECIFIC PLAN LAND USE PROPOSAL

3.1 Project Overview

The proposed Specific Plan site will be zoned for a 575 room resort hotel and ancillary uses, plus 2 golf holes within a 9 hole expansion to the existing 18 hole Starr Pass golf course. With a total site area of 197 acres, the hotel and golf course will require 48 acres leaving 149 acres of natural area.

The Starr Pass Resort Hotel, with many ancillary uses such as the spa, restaurants, and meeting facilities, will provide a positive and attractive amenity to the area. In addition, the hotel is unobtrusively located in a box canyon. The hotel structure is designed to blend into the backdrop of the Tucson Mountains.

3.1.1 Land Uses and Zoning Boundaries

Exhibit 3.1-A delineates the boundaries relating to the Specific Plan. In order to provide optimal interrelationships of the resort hotel with both the Starr Pass Master Plan and Tucson Mountain Park, the following land uses proposed for the site are illustrated in Exhibit 3.1-B.

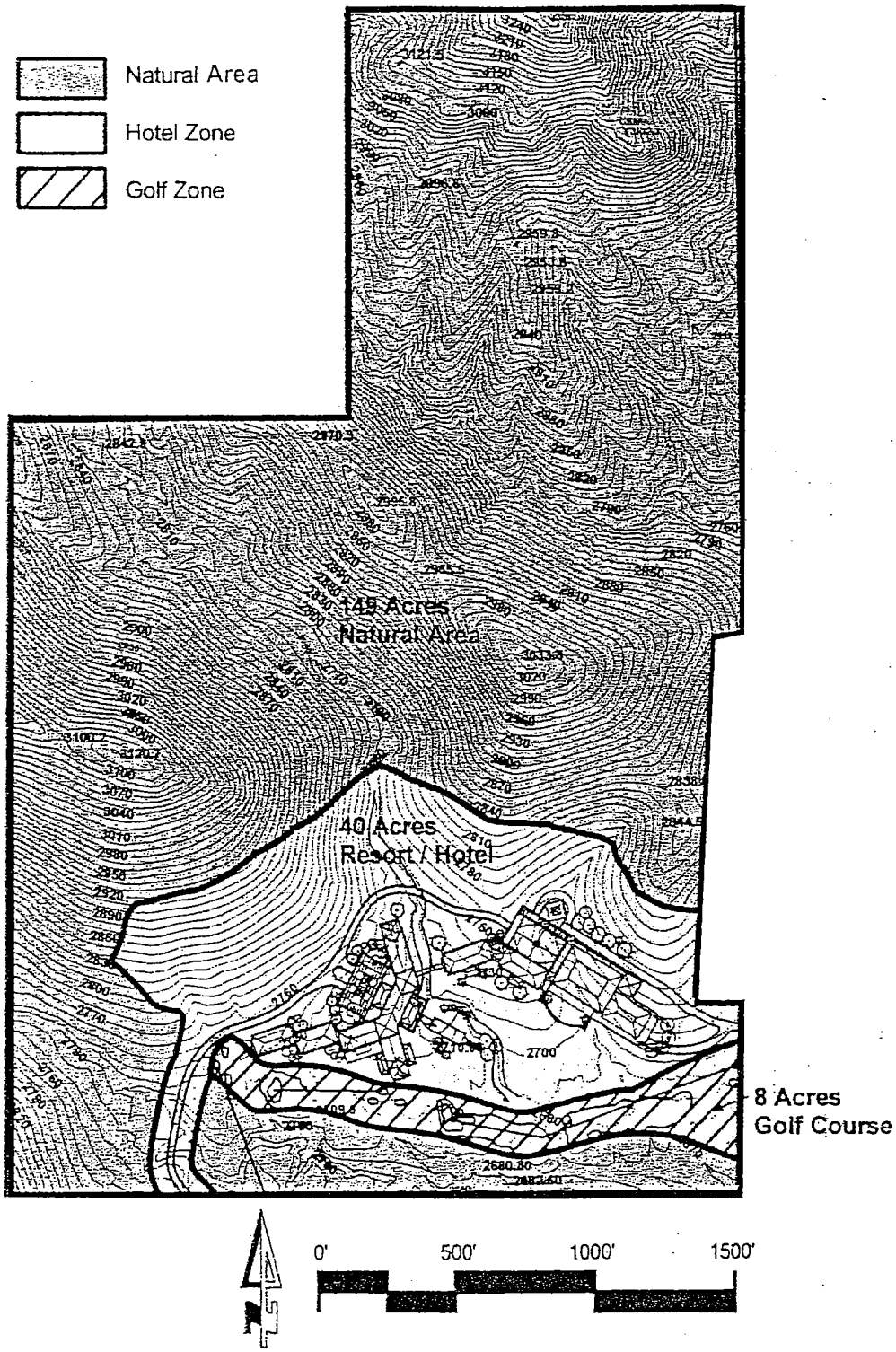
- 575 to 600-room full service resort hotel on 40 acres of land including ancillary uses such as the conference center, meeting rooms, retail shops, spa, restaurants, tennis courts, pools, and terraces; the resort hotel will be connected to Starr Pass via an eastern service vehicular entrance and a western patron access roadway;

- two golf holes on 8 acres will form part of a 9 hole expansion to the existing 18 hole Starr Pass golf course;

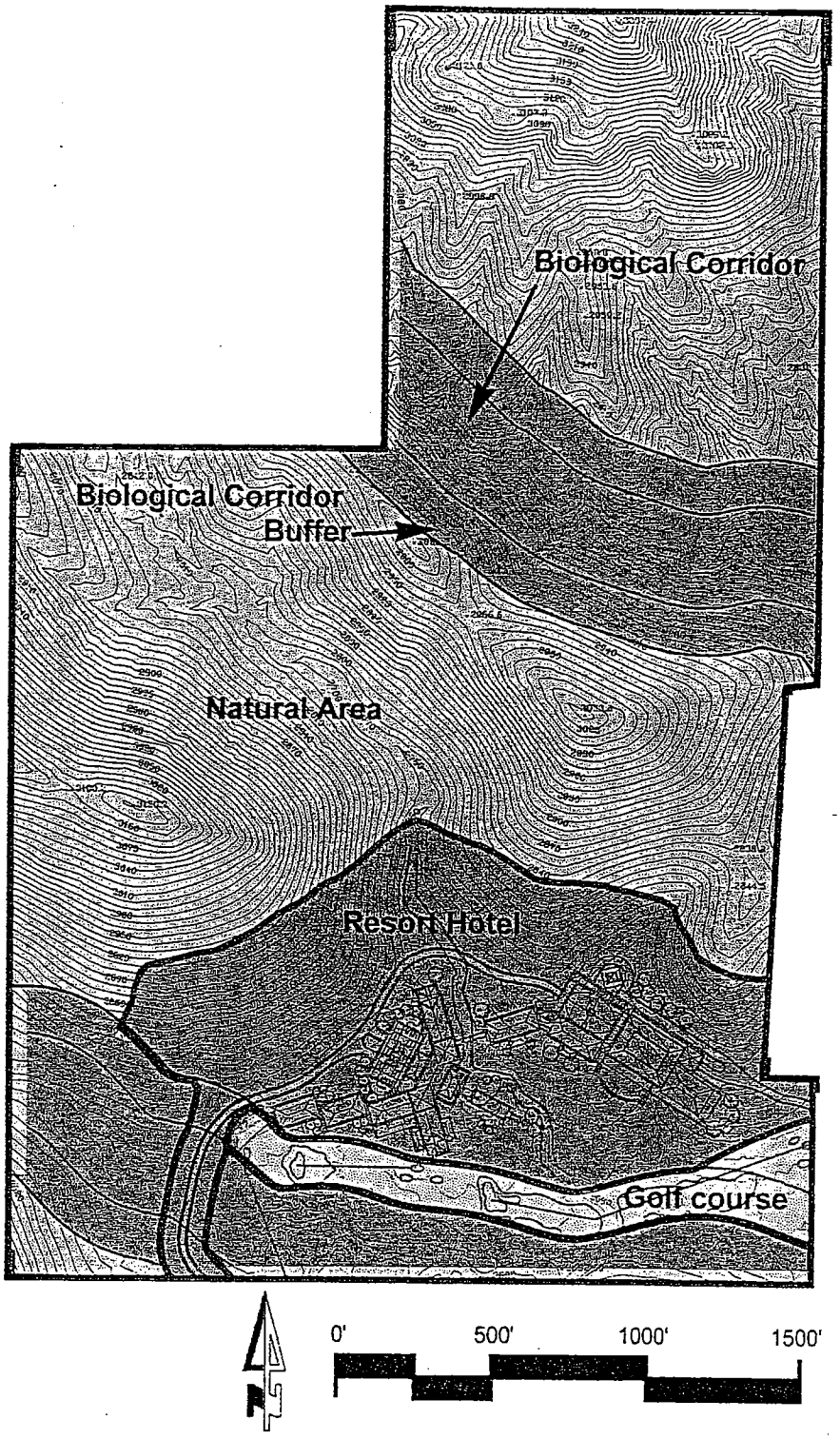
- natural area of approximately 149 acres will be conveyed for the expansion of Tucson Mountain National Park. This natural area serves as a buffer between the Starr Pass development and Tucson Mountain Park; and

- biological corridors within the natural area will connect Tucson Mountain Park through the Specific Plan site and the Starr Pass Master Plan area to the University of Arizona Desert Research Laboratory at Tumamoc Hill.

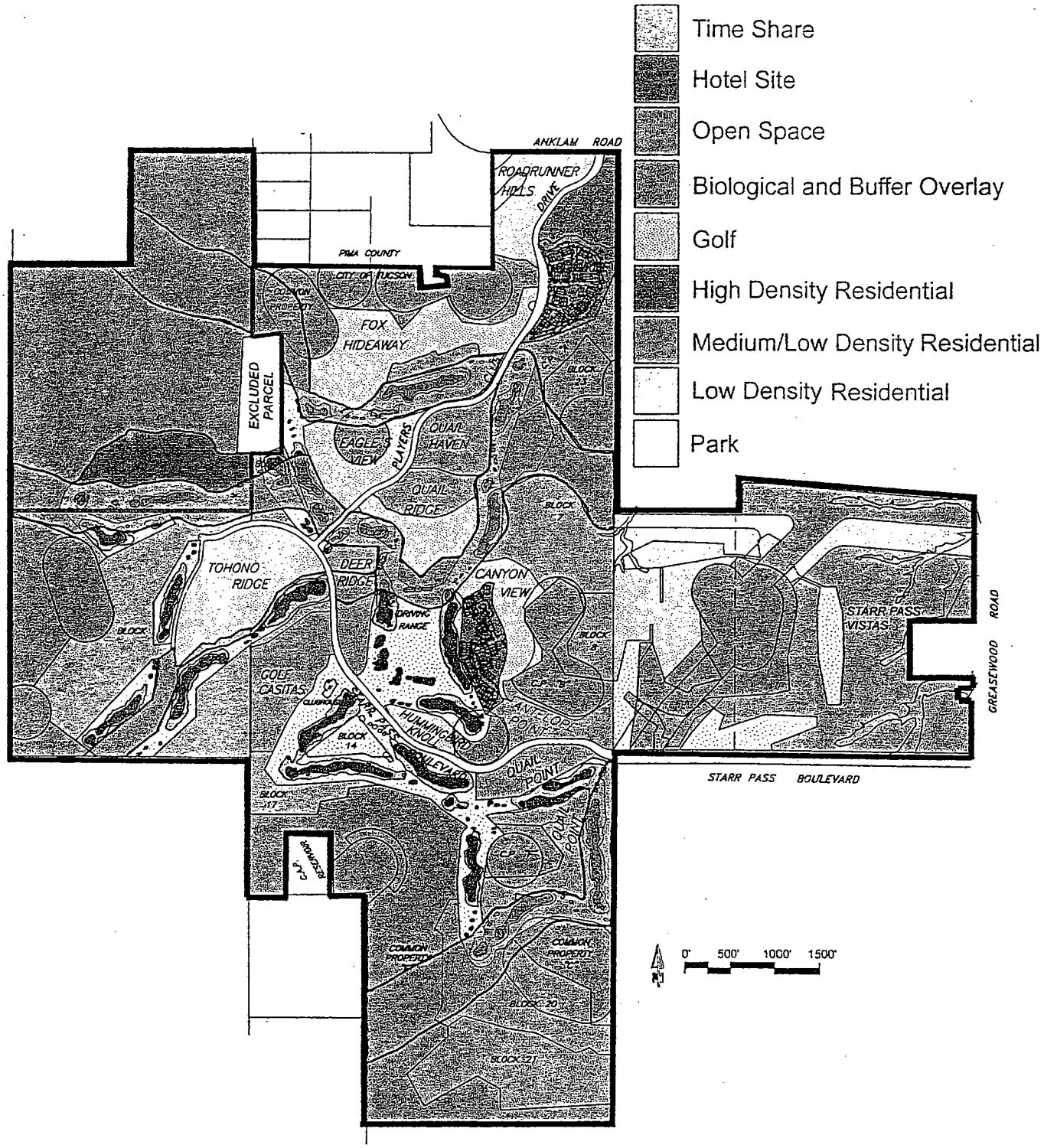
The Specific Plan provides an effective decrease in density at Starr Pass. A comparison of the Existing Land Use Plan (Exhibit 2.2-A) with the Proposed Starr Pass Master Plan (Exhibit 3.1-C)



Specific Plan Zone Map
Exhibit 3.1-A



Specific Plan Land Use
Exhibit 3.1-B



Proposed Starr Pass Master Plan
Exhibit 3.1-C

illustrates how relocating the resort hotel from its currently zoned location on Block 25 to the proposed Pima County site provides the advantages of increased open space, creation of biological linkages, and reduced overall development densities at Starr Pass. While the total area of Starr Pass increases by 197 acres, the overall development rights, including the hotel, remain at 2,100 units.

In conformance to the Pima County Comprehensive Plan Policies the proposed hotel uses are clustered to minimize site disturbance area; underground parking is provided to keep the more intensive land uses to a small area of the site; the 149 acre natural area zone will provide a natural buffer from the low (in this area) intensity use of Tucson Mountain Park to the higher intensity use of the hotel.

3.1.2 Built Form

The resort hotel's built form (illustrated in Exhibit 4.3-A) has been designed to accomplish the following goals:

- locate the facility within a box canyon to minimize its visual impact on the existing Starr Pass and surrounding communities;
- minimize the development footprint to limit the disturbance of the Sonoran Desert;
- locate approximately 150 parking stalls off-site in the Starr Pass Development and approximately 650 parking stalls in underground structures at the resort. This will further minimize site disturbance and remove unsightly on grade parking lots from the desert slopes; and
- create a hotel built form that progressively builds height towards the center to mirror the surrounding desert peaks and ridges.

Similar design principles were applied to the golf course design as outlined below:

- strategically locate the golf facility on the site's undulating foothill topography to enhance the biological corridor;
- utilize a low impact target golf concept to minimize site impact and promote wild life migration;

- maximize water conservation using City of Tucson reclaimed water and an efficient irrigation system;

- utilize mitigation and enhancement, to maintain native vegetation throughout; and

- mitigate the disturbed areas to achieve natural site vegetation densities.

3.1.3 Circulation

Access to the site will be from Starr Pass Boulevard. To minimize site disturbance to the hillsides, the main access road follows south side of the biological corridor, also known as the west branch of the Anklam Wash. There will be two entry and exit points to the site to limit traffic congestion and provide efficient access to fire and emergency vehicles. A five foot bicycle lane will be striped along the main entry road . The addition of the two foot curb and gutter allows the bike lane to double as golf cart access as well. Along one side of the entry road will be a four foot pedestrian sidewalk. A center median is also proposed at key arrival points to clarify traffic circulation.

Onsite traffic circulation will be provided through private streets, the underground parking areas, the resort hotel entry drop off areas, guestroom access points and loading zones. The service entrance will split off to the North and follow the topography around to the back of the convention structure . This roadway will provide access for the service trucks and emergency vehicles. The preliminary development plan is designed to minimize the paved areas and site disturbance where possible. The majority of onsite parking will be in the form of an underground structure. This underground parking will minimally impact and scar the site, leaving as much area as possible to remain as natural area. This principle is consistent with the idea of cluster design.

Pedestrian circulation and functional open space in the immediate area of the hotel shall be hardscaped and handicapped accessible. Materials used will be natural in color. Pathways leading through the site and to the golf course shall be designed to closely follow the natural site terrain and shall be mitigated with desert landscaping, and engineering improvements will be designed using natural-like materials and techniques.

3.1.4 Biological Corridors

The Harris Environmental Biological Corridor study identified three biological corridors on the Anklam property. They are a part of an overall biological linkage system which connects Tumamoc Hill with Tucson Mountain Park. The two main biological corridors traverse the site in a east-westerly direction, one is located in the northern 1/3 portion of the site and the other closely follows the Anklam Wash along the southern boundary of the site. (See Harris letter, Appendix one)

The third, middle corridor, is within the site area required for hotel construction. Given the concentrated site development and the effective linkages provided by the first two corridors, wildlife will have continuous access between the University of Arizona Desert Research Laboratory at Tumamoc Hill, and Tucson Mountain Park.

The biological corridors on-site are 300 feet in width and will be left in their natural state, except for ingress/egress to the hotel site. They will be protected by a 150 foot biological corridor buffer easement which lines each side of the biological corridor. Per recommendation by the Harris Environmental Group, these easements will not contain any permanent above ground structures except necessary drainage structures and will be limited to 50% disturbance by golf course, irrigation lines, necessary utilities, drainage structures, ingress/egress, and cart paths within the Specific Plan Area. Trails adjacent to, within, or across the biological corridors will be prohibited.

3.1.5 Open Space

The hotel site is adjacent to an ecologically sensitive area of the Tucson Mountain Park. Adjacent to the hotel location is a rich community of plant and animal habitat. It is in the community's and the park's best interest to minimize impact on this area of Tucson Mountain Park by the hotel use as much as possible. Accordingly, the plan encourages guests to enter the Tucson Mountain Park trail system via the future proposed Starr Pass Trailhead ½ mile south of the hotel site. Although, the golf course will not provide cover for wildlife, animals will commonly graze on the golf course at dawn and at dusk. Guests may enjoy the views and peace and quiet that the open space provides from hotel windows, patios and balconies.

The preliminary development plan dedicates most of the Specific Plan area as natural area. There will be two golf course holes on the site classified as functional open space. The onsite golf course zone will be a total of 8 acres. These golf course holes will be an addition to the existing 18-hole golf course which meanders through the Starr Pass Master Plan Area, east and south of the project site. There will be no maintenance or club house facilities on the Specific Plan site. Restrooms and other golf related facilities will be a part of the hotel operations. The Starr Pass Club House, Starter Area and Pro Shop will be maintained at their existing location on Starr Pass Boulevard south of the site. The club house facility will maintain the golf operations for all future 36 holes of the Starr Pass Championship Golf Course. The hotel zone includes both natural and functional open space areas. The natural areas are those areas left undisturbed on the periphery of the hotel and golf course zone. The functional open space includes pedestrian circulation, the swimming pool area, the spa and patio areas all softened with landscaping. The mitigated landscape and riparian areas will be integrated into the hotel layout and will follow along the entry road.

3.2 Preliminary Development Plan (PDP)

The Preliminary Development Plan covers 197 acres. A maximum of 48 acres of the site area will be used for hotel, golf, and other related uses. The balance of the property, approximately 149 acres, shall remain as natural area and will be conveyed when the Specific Plan is approved. Associated amenities such as a spa, swimming pool, tennis courts, bar/restaurant, gift shops and convention center will be located on the hotel site as well. See Exhibit 3.2-A, Preliminary Development Plan, and 3.2-B, Preliminary Development Plan Detail.

The total gross floor area is approximately 1,000,000 square feet. This includes square footage for rooms, convention center, restaurants, commercial areas, underground garage, spa, and recreation areas. (see following Chart 3.2) The height of the hotel structure at the highest point is approximately 110 feet. See Height Zone, Exhibit 3.2-C.There will be 2 or 3 structures, i.e., a spa, the hotel and the convention center (which is connected via skywalk to the hotel).

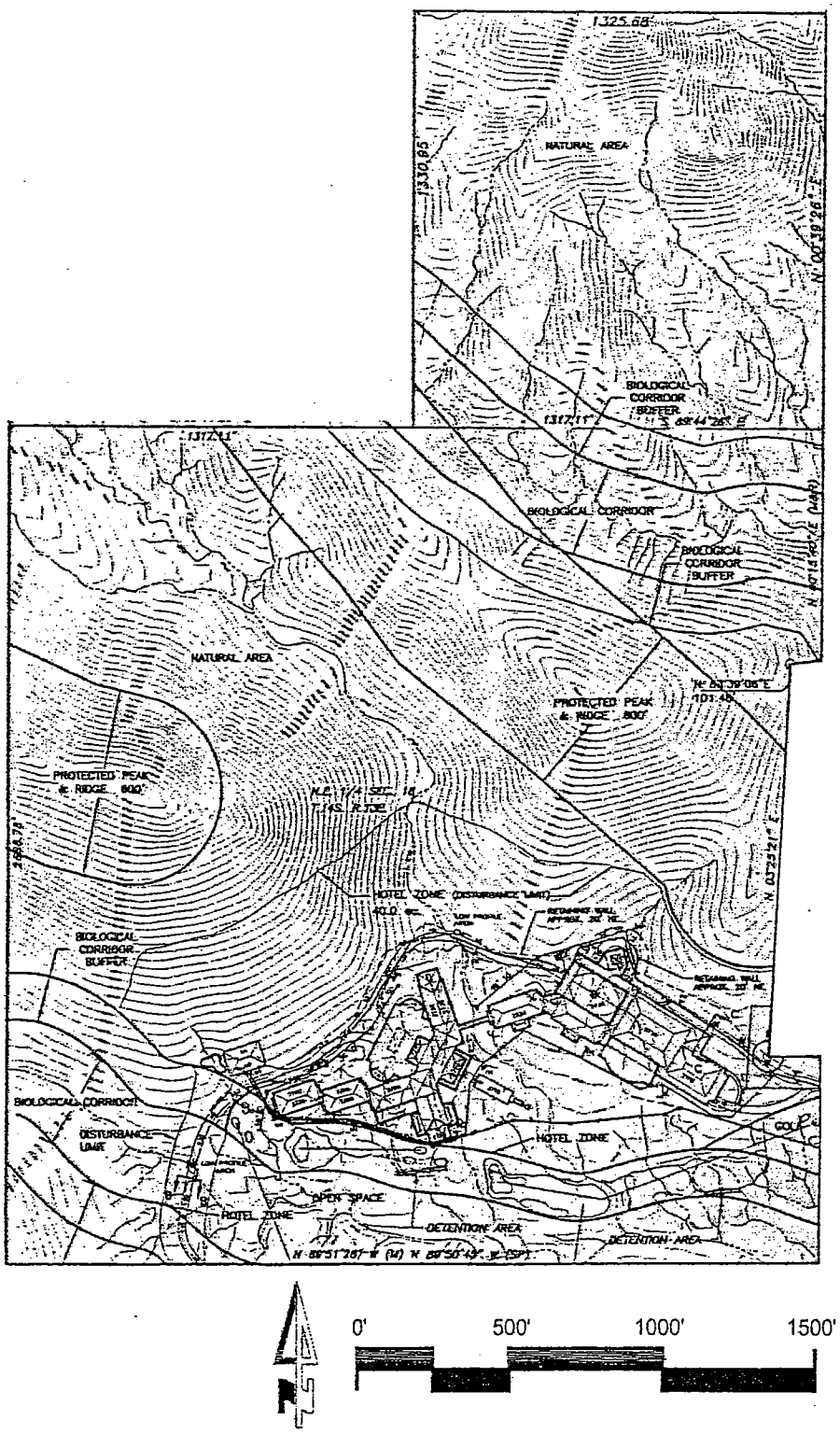
The hotel is planned for 575 guests and the convention center will have ballrooms, meeting rooms, conference suites and board rooms to accommodate all types of events. Parking onsite will be provided for approximately 650 vehicles, underground beneath the entry of the hotel and the convention center with limited on site parking discretely screened at the entry plazas.

The following chart illustrates the various hotel uses and their associated square footages:

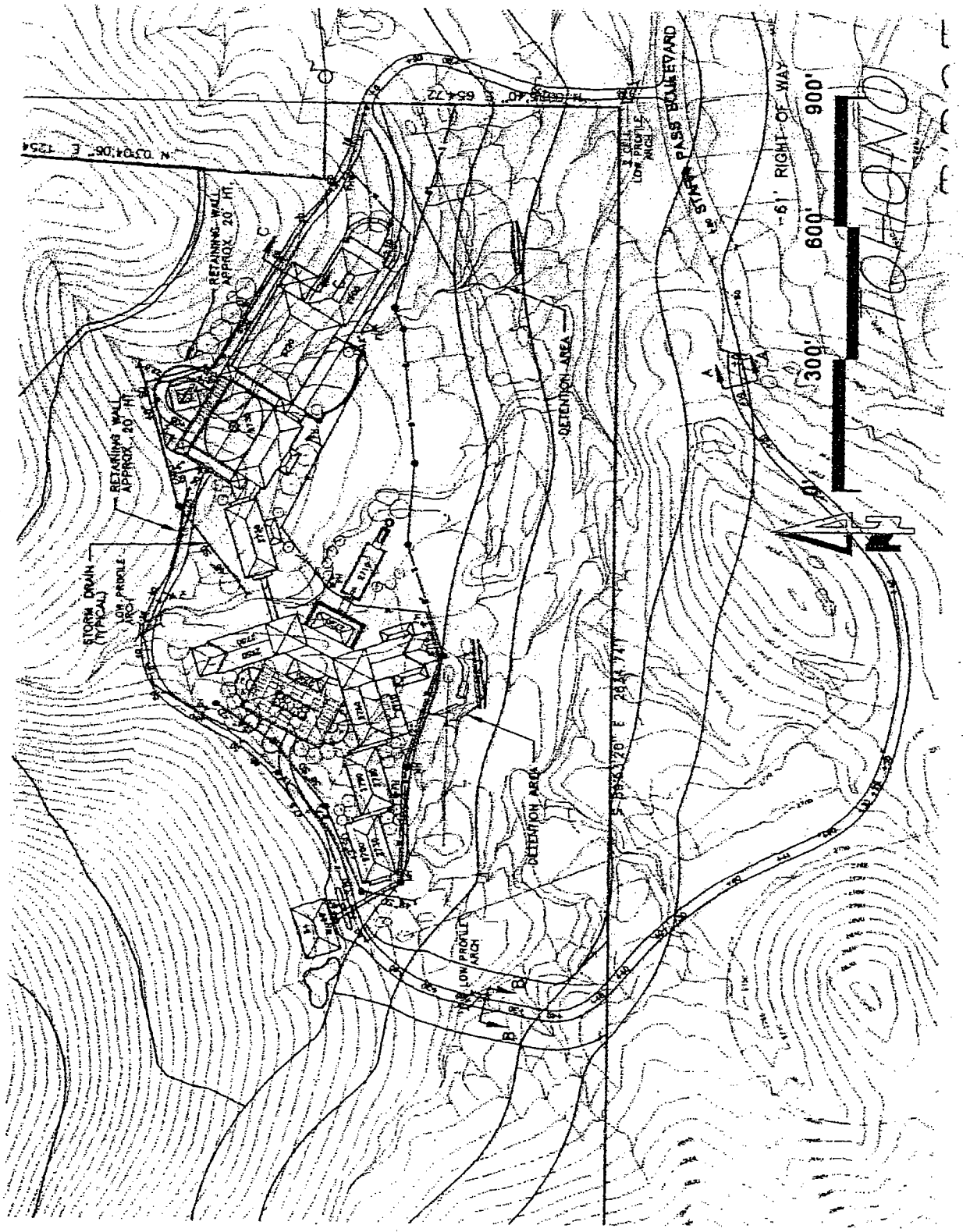
Chart 3.2-A

Hotel Development

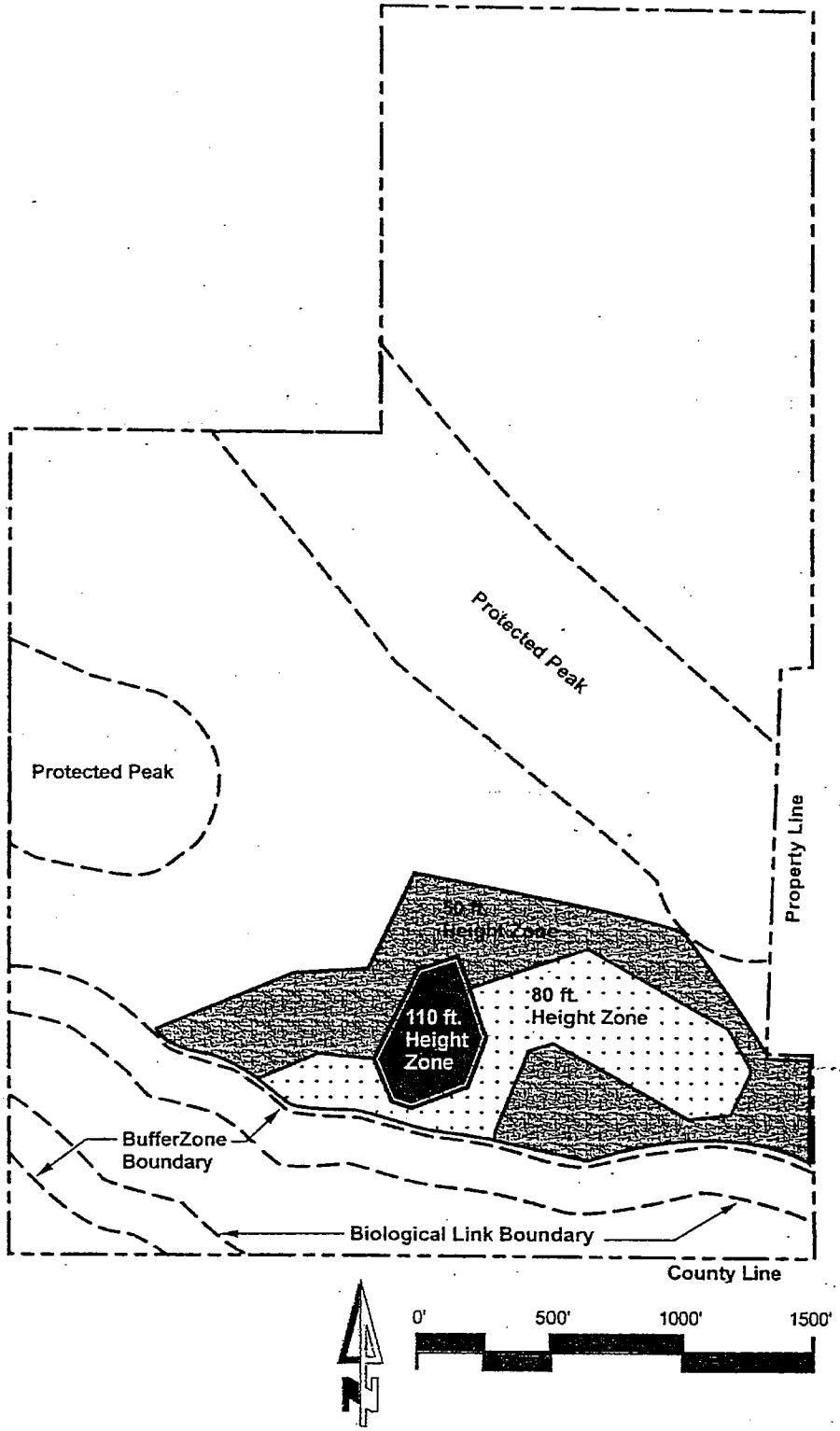
HOTEL USAGE	SIZE
575 Rooms	410,000 sq. ft.
Convention Center	58,000 sq. ft.
Spa/Recreation	50,000 sq. ft.
Food & Beverage	34,000 sq. ft.
Commercial	10,000 sq. ft.
Miscellaneous	138,000 sq. ft.
Hotel/Convention Center/Underground Garage	308,000 sq. ft.
Maximum Parking Spaces	650 on-site/150 off-site



Preliminary Development Plan
Exhibit 3.2-A



Preliminary Development Plan Detail
Exhibit 3.2-B



Height Zone Exhibit
Exhibit 3.2-C

3.3 Existing Land Uses

Since there are no existing land uses on-site, the hotel development will have no impact. By consolidating hotel and golf uses within only 48 acres of land, the proposed development provides for the maintenance of 149 acres in a native desert environment.

3.4 Topography

3.4.1 Grading Concept

The Anklam Property largely contains slopes exceeding 15%; however, there are areas of moderate slope (less than 15%) in the southern portion of the site near the Anklam Wash. As illustrated in Exhibits 2.5-B and 3.1-B, the Proposed Development Plan utilizes to the fullest extent those areas which are less than 15%. The limitation of construction to the lower slope areas is being achieved with subsurface parking and higher building forms. Some 15% slopes will be disturbed by road, structure and golf course construction. All slopes disturbed by construction will be treated to minimize visual impact of the view to cuts by a variety of methods, including:

- placement of structures in the foreground, shielding the view of the disturbed areas;
- plating of fill over rock excavations, together with revegetation of the plated fill;
- treatment of exposed rock cuts with stain or varnish to reduce reflectivity of the freshly cut rock faces; this can be further softened by the creation of soil pockets within the cut to break up the linearity of the cut and to allow the introduction of vegetation mid-slope;
- where fill slopes are exposed, placement of large boulders in a controlled, engineered fashion (rockeries), with revegetation using specimen trees and hydroseeding can be performed in the soil placed between the boulders;
- retained earth systems utilizing gravity blocks together with geotextiles in a curvilinear placement;

- terraced slopes with vegetation between vertical wall/slope elements;

- other methods, as identified as being acceptable in the Pima County Grading Design Manual;

- all slopes shall be stabilized, however finished slopes shall be rounded at the top and have a curvilinear horizontal alignment where possible; and large cast in place or masonry retaining walls shall be avoided.

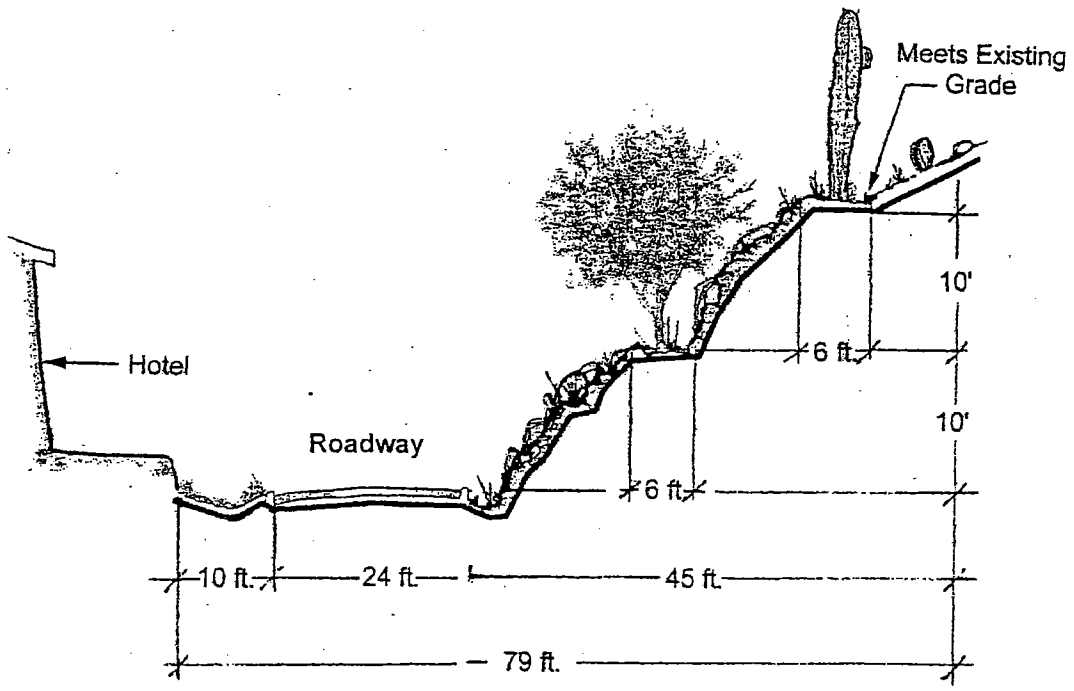
See Slope Treatment Section, Exhibit 3.4-A

3.4.2 Cross-Slope Analysis

The site has an existing average cross-slope of 35.5%, as identified in the Inventory and Analysis, Section 2.5.2. This average cross-slope must be reduced below 15% in order to permit the land use proposed. This project accomplishes this reduction in average cross-slope through the designation of Natural Areas, which will be conveyed to Pima County for the expansion of the Tucson Mountain Park. After the exclusion of land to be conveyed to Pima County for the expansion of Tucson Mountain Park from the original site area of 197 acres, 35,281 feet of contour length remains for the revised Average Cross Slope (ACS) calculation. The Contour interval remains at 10 feet. The revised average cross-slope, after exclusion of Natural Areas to be conveyed to Pima County, was computed in accordance with the HDZ calculation method identified in section 18.61.030 of the Pima County Zoning Code, where:

$$\frac{ACS = I \times L \times .0023}{A} = \frac{(10)(35.281)(.0023)}{197} = 4.12\%$$

The areas to be protected as Natural Area and conveyed to Pima County for the expansion of Tucson Mountain Park, as well as the areas to be graded and either stabilized or built upon are shown in Exhibit 3.1-A. All disturbed areas shall be either built upon or stabilized.



Slope Treatment Section
Exhibit 3.4-A

3.4.3 Grading Requirements

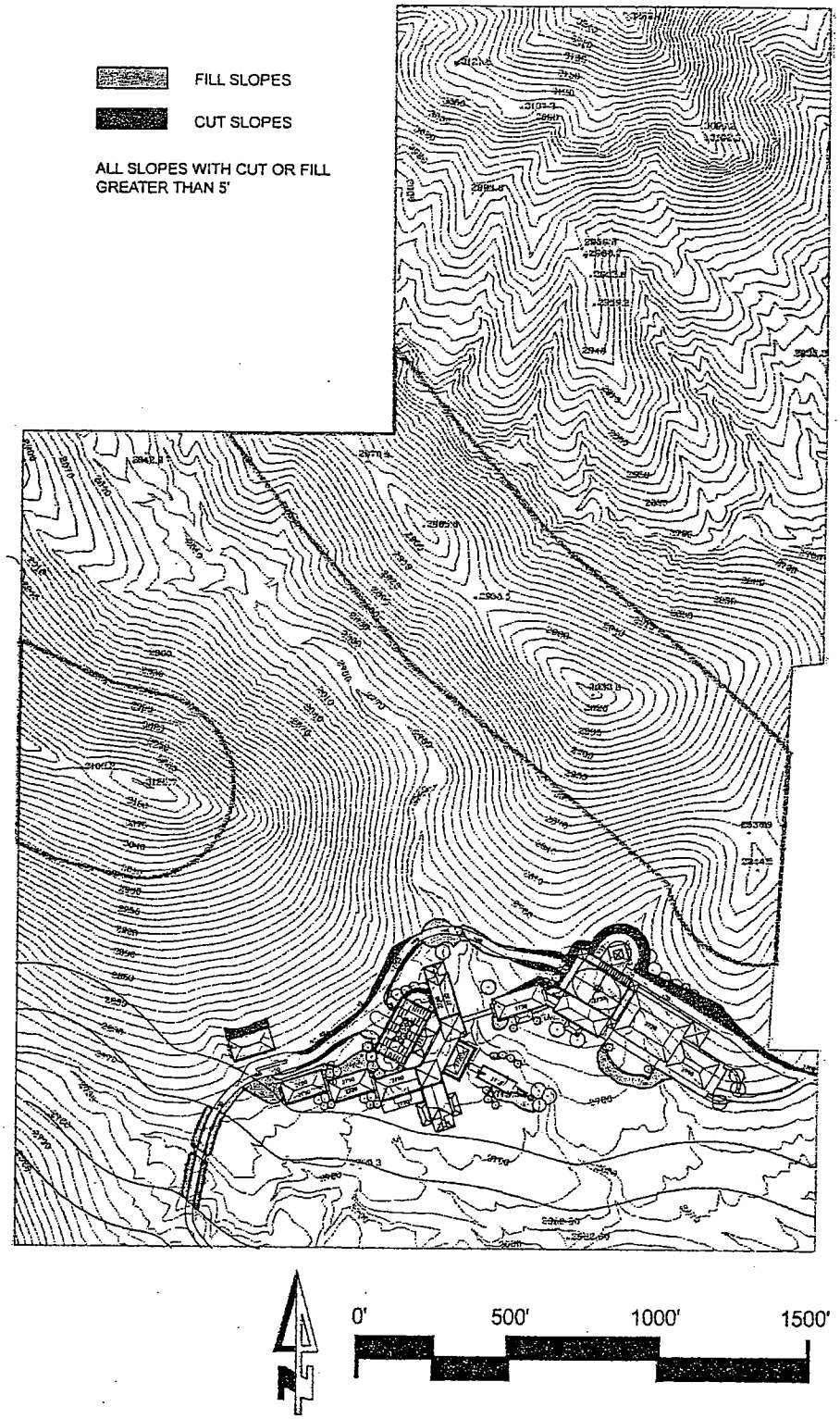
Because of the severity of the terrain, it is anticipated that the large majority of the land to be graded, will have a cut or fill greater than 5 feet, except in a narrow band near the cut/fill hinge point. Exhibit 3.4-B identifies those areas anticipated to have more than 5 feet of cut or receive more than 5 feet of fill. It is anticipated that the project will have a maximum depth of cut, measured vertically, of 25 feet. The maximum anticipated depth of fill, also measured vertically, is 20 feet.

Cut slopes will be designed to be as steep as practical, with much of the excavation work requiring blasting. In addition to the observation requirements of the Pima County Blasting Ordinance No. 1997-58, a Geotechnical Engineer will observe the site after completion of the blasting and ensure that residual slopes are coherent and stable. It is preferable to have exposed rock cuts stained and selectively plated with soil and revegetated, rather than uniformly treated. Where possible, exposed rock cuts will be shielded from offsite views by building mass. The fill areas will be protected by the creation of rockeries, using large boulders placed in an engineered fashion together with revegetation of the areas between the boulders. However, it is important to have a variety of different slope treatment types and avoid uniformity. It will be a project goal to have balanced earthwork on the site and to minimize export of material.

Specific relief from the Hillside Development Overlay Zone (HDZ), Chapter 18.61 of the Pima County Zoning Code is required for the following:

- Maximum cut and fill. The maximum cut and fill for this project is 25 feet of cut. Fill will be held to a maximum of 20 feet. Section 18.61.080.B.1 identifies a maximum allowable vertical cut or fill of 15 feet.

- Maximum Grading. The areas remaining after exclusion of Natural Areas, 80% of the remainder may be graded. This will be in conformance with Table 18.61.080 of the HDZ Zoning Ordinance.



Five Foot Cut/Fill
Exhibit 3.4-B

3.5 Hydrology

3.5.1 Preliminary Hydrology Development Plan

The Preliminary Development Plan for the Specific Plan site shall leave the main channel of the west branch of the Anklam Wash that runs through the property undeveloped. There will be no disturbance of this watercourse, other than a road crossings with a low profile arch culvert or similar concrete structure, constructed to convey the 100-year peak flow, and utility corridors in areas where the utilities can not feasibly be combined with the roadway.

Erosion hazard setbacks shall be maintained along the west branch of the Anklam Wash. However, encroachments/improvements to watercourses other than the west branch may be necessary. Every effort shall be made to minimize the degree of encroachment and disturbance to the watercourses and their associated vegetation.

All flows will be discharged from the site at their natural points of concentration.

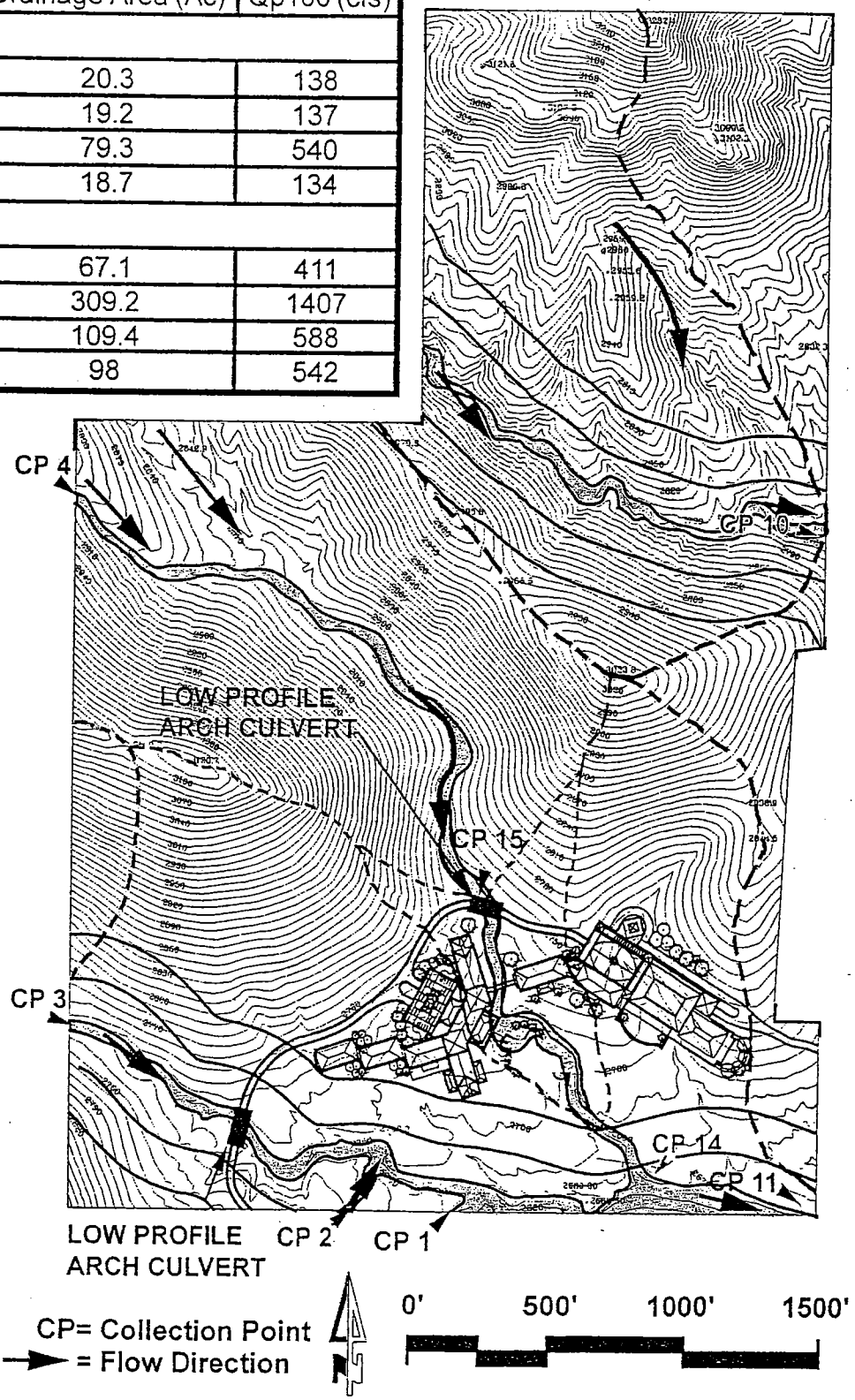
3.5.2 Encroachment into 100-Year Floodplain

Encroachment into the floodplain and alteration of the channel of the minor watercourse that runs diagnally from the northwest to the southeast corner of the site will be necessary in the vicinity of the proposed Hotel structure. Because there is a limited area of gentle terrain where the resort structures can be placed onsite, the channel of this minor wash shall be modified. While it is not anticipated that increased discharges will result from this channel modification, the concern for channel migration and excessive sediment movement shall be addressed through channel stabilization. Where the channel falls within erosive soils, it will be stabilized with rock armor. Where the channel is founded in bedrock, efforts shall be made to leave the channel bottom with an irregular shape to prevent high velocities.

3.5.3 Post-Development Discharge

The preliminary post-development 100-year peak discharges and the associated floodplains are shown on Exhibit 3.5-A. The main channel of the west branch of the Anklam Wash, exiting the site at CP11, will have a 100-year peak discharge of 1638 cfs post-development. The northern channel, exiting the site at CP10 will have a 100-year, post-development peak discharge of 411 cfs. Water harvesting and/or retention/detention will be performed where feasible onsite within the golf course to decrease the peak flows at CP11 to the greatest extent possible.

Proposed 100-year Peak Flows		
CP#	Drainage Area (Ac)	Qp100 (cfs)
Off-Site		
1	20.3	138
2	19.2	137
3	79.3	540
4	18.7	134
On-Site		
10	67.1	411
11	309.2	1407
14	109.4	588
15	98	542



Post Development On-Site Hydrology
Exhibit 3.5-A

3.5.4 Impacts to Off-Site Land Uses

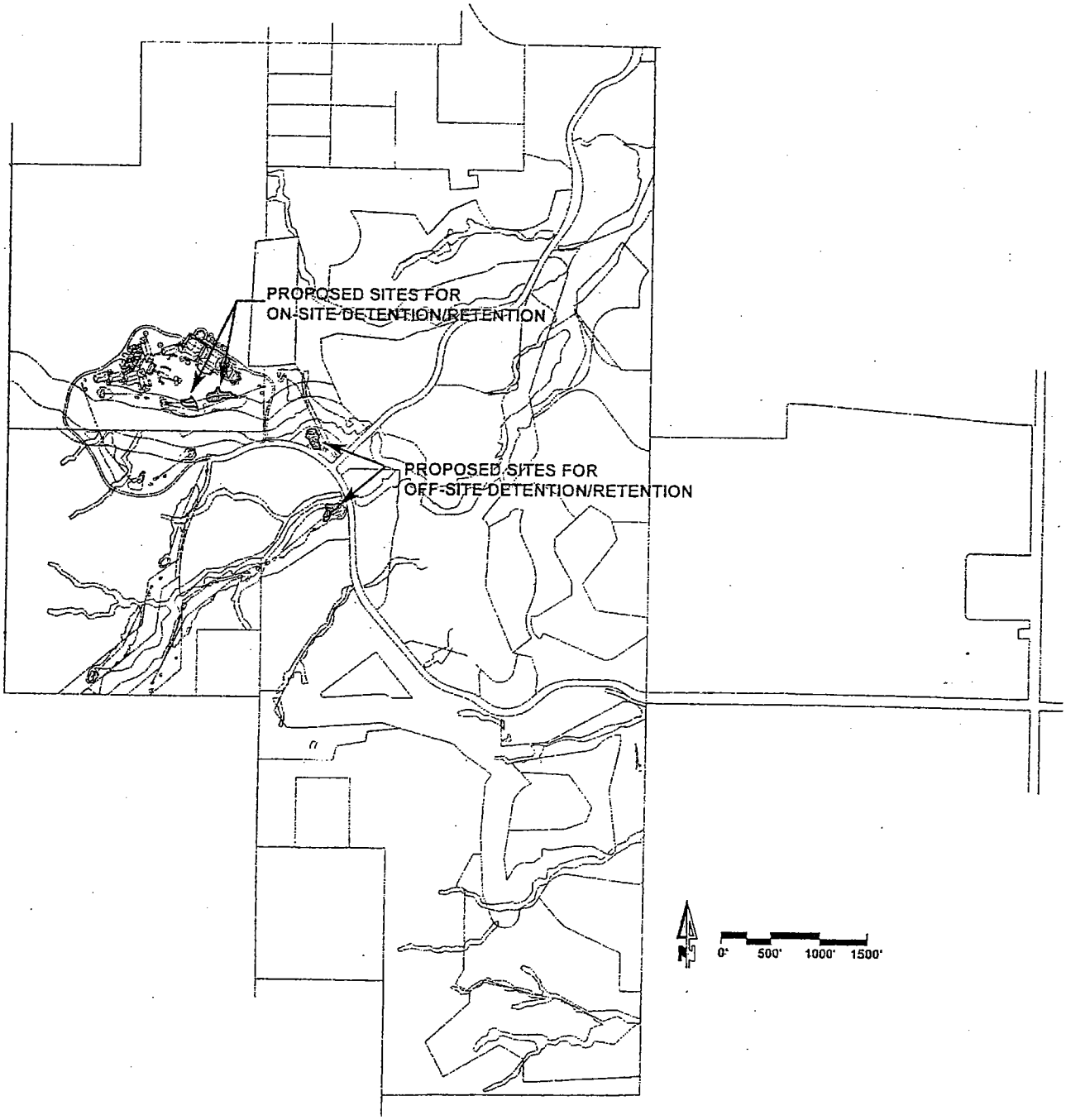
The increase in peak flows and volumes created by the hotel development within Specific Plan shall not negatively impact downstream property within the Starr Pass Development. The 100-year, post-development peak flow can be conveyed within the west branch of the Anklam Wash without peaking its bank or causing an appreciable increase in 100-year water surface elevation above existing levels. The increased flows and volumes within the west branch of the Anklam Wash will be fully mitigated within the Starr Pass Development boundaries.

3.5.5 Modification of Existing Drainage Patterns

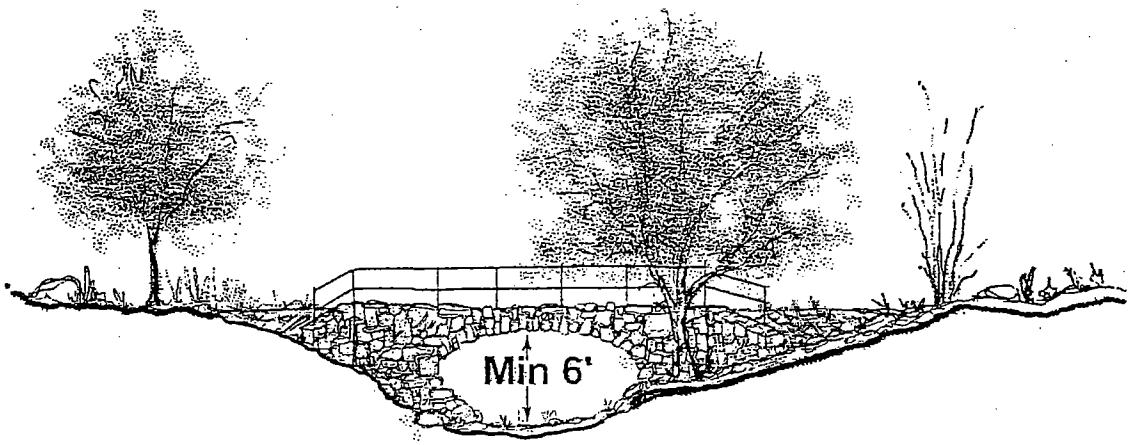
The development-induced increase in the 5-year runoff volume and the 2-, 10-, and 100-year runoff peaks at the outlet of the property (CP 11 on Exhibit 3.5A) will be detained onsite and offsite within adjacent Starr Pass property. The retention/detention facilities will be offline of existing drainageways so as not to jeopardize existing sediment transport characteristics or riparian vegetation. Exhibit 3.5-B shows the proposed location for offsite mitigation.

Detention/retention basins are proposed to be constructed in Block 5 and Block 13A of the Starr Pass Property. The mitigation within Block 5 would be offline of the west branch of the Anklam Wash just downstream of the hotel property outlet. The mitigation within Block 13A would be offline of the main branch of the Anklam Wash that confluences with the west branch just west of its entrance into the Quail Ridge Subdivision. Any detention/ retention of the main branch of the Anklam would decrease the volume and the peak flows of the Anklam Wash at the outlet, at the intersection of Anklam Road and Players Club Drive, of the Starr Pass property and thus would mitigate the increases caused by the hotel development.

The main channel of the west branch of the Anklam Wash as it passes through the hotel property will not be disturbed other than by the road crossing and utility corridors. These crossings are necessary for access to the hotel and every effort shall be made to minimize the extent of any impact. The road crossing will be mitigated with riparian vegetation and an arched culvert will be designed to promote wildlife movement. A preliminary cross section of the culvert is shown in Exhibit 3.5-C.



On-Site/Off-Site Detention/Retention Basins
Exhibit 3.5-B



Drainage Culvert Cross-Section
Exhibit 3.5-C

Runoff generated onsite will be conveyed to the major washes via existing minor channels, improved channels, storm drains or streets.

The minor watercourse which flows diagonally from the northwest to the southeast corners of the site will be modified as it passes through the resort structure area. A skywalk will span the wash between buildings at an approximate elevation ten feet above the existing invert of the wash. The channel, as it passes through the resort site will be stabilized and revegetated. The hotel buildings within the 100-year floodplain will be protected from flood hazards with retaining walls and finished floor elevations well above the 100-year Water Surface Elevation (WSEL). Channel design and building layout will ensure that the 100-year flood is safely conveyed around the buildings.

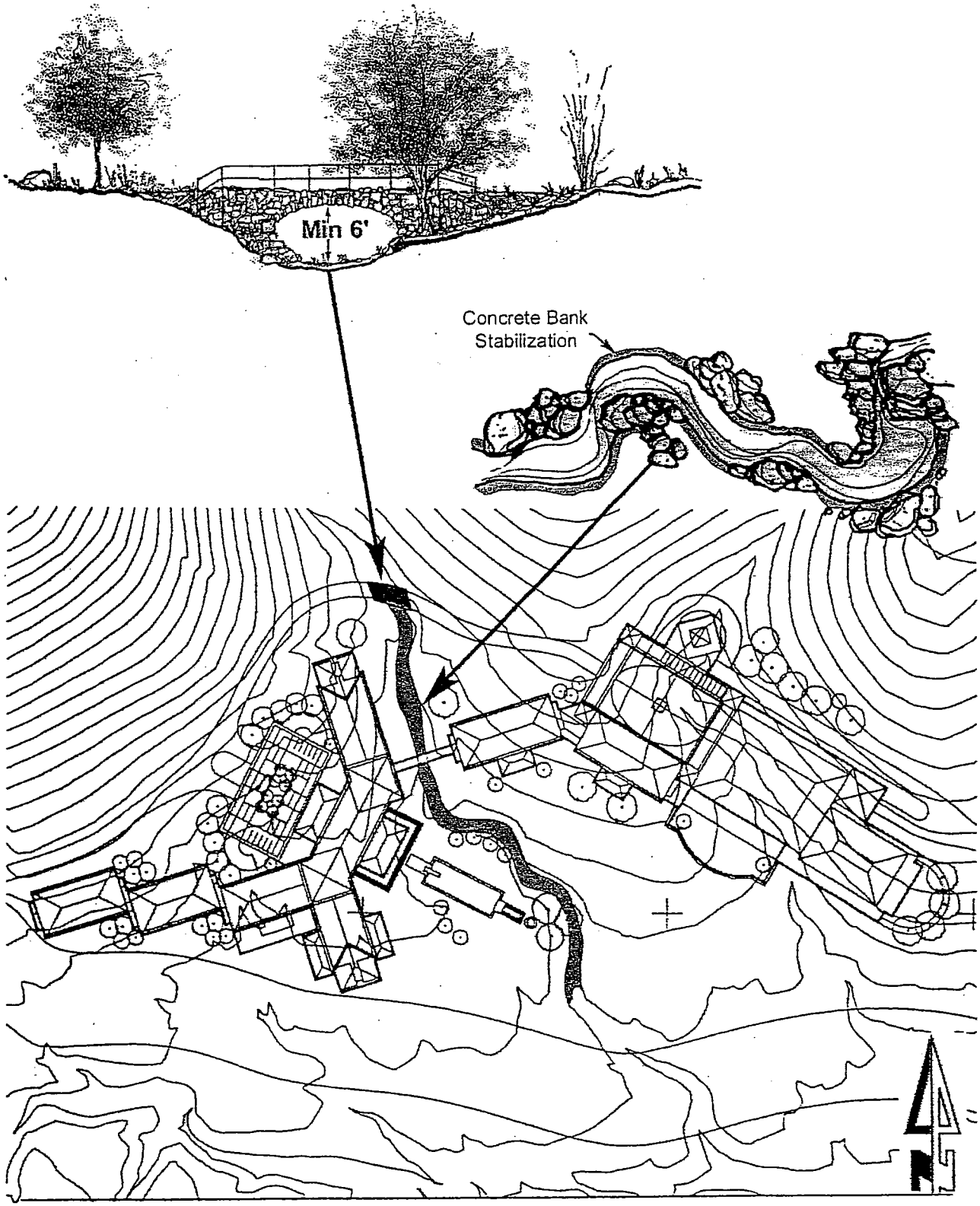
An erosion hazard setback zone will be determined for this wash by accounting for the shallow depth of the bedrock in this area. All encroachments into this erosion hazard setback zone will incorporate appropriate erosion control and bank protection measures. The retaining walls will have toe-down depths below the scour depth or to the depth of bedrock, whichever is shallower. All erosive soils through which this modified channel will pass shall be armored with indigenous riprap.

A low profile arched culvert crossing will be necessary for the intersection of this minor wash with the resort's access road. This culvert will convey the 100-year peak flow. A preliminary alignment modifying the channel through the culvert and the hotel is shown in Exhibit 3.5-D.

3.5.6 PDP Conformity to Flood Control Policies

The following design principles will avoid any negative impacts on the Anklam Wash by:

- constructing detention/retention facilities in accordance with balanced basin criteria in offline facilities;
- releasing retained flows to the Anklam Wash in discrete, small flows to promote infiltration into the riparian areas;
- avoiding disturbance to the existing channel except at necessary roadway and utility crossing; and
- creating a buffer along the wash for permanent protection.



Channel/Culvert Alignment
Through Resort
Exhibit 3.5-D

Through these measures, sediment transport and flooding potential to upstream and downstream properties shall remain relatively unchanged between the pre- and post- development conditions. Runoff will be allowed to enter the site without any obstructions to cause upstream backflow. All concentrated runoff will exit the site within the existing washes. Offsite retention/ detention facilities within adjacent Starr Pass properties will mitigate the increase in 2-, 10-, 100-year runoff peak flows, and the 5-year runoff volume created by the hotel development.

The placement and design of the retention/detention facilities will be included in the Drainage Report as submitted with the Development Plan. The erosion hazard setback zones researched and delineated will be in this Drainage Report. The proposed channel improvements will be stabilized by rock bank reinforcement where necessary to prevent either lateral channel migration or excessive sediment yield.

All construction improvements shall conform to existing Pima County drainage development requirements, including those contained within the Pima County Drainage Design Guidelines, the Pima County Stormwater Detention/Retention Manual, and the Pima County Floodplain and Erosion Control Ordinance.

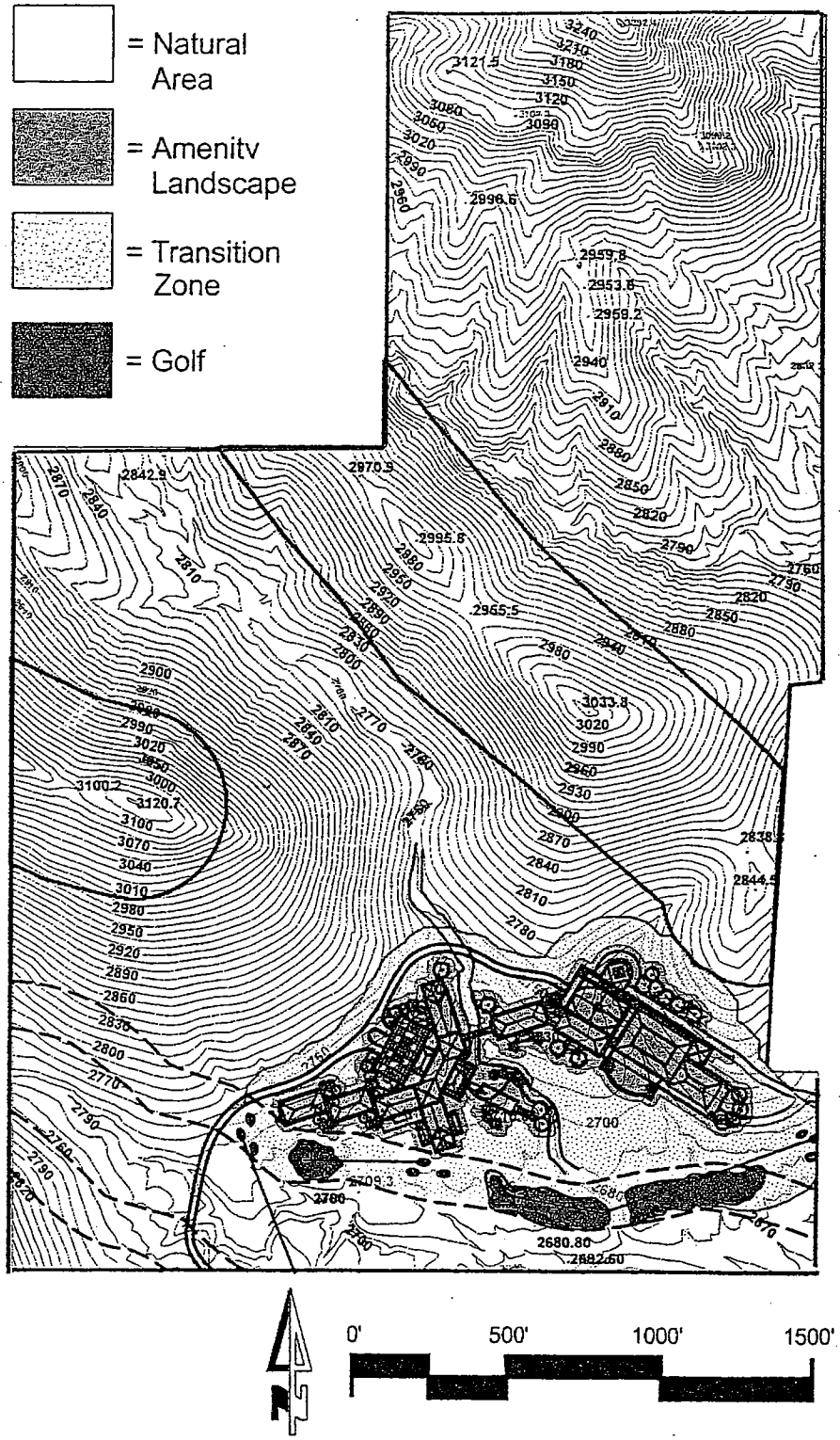
3.6 Vegetation

3.6.1 Landscape Concept Plan

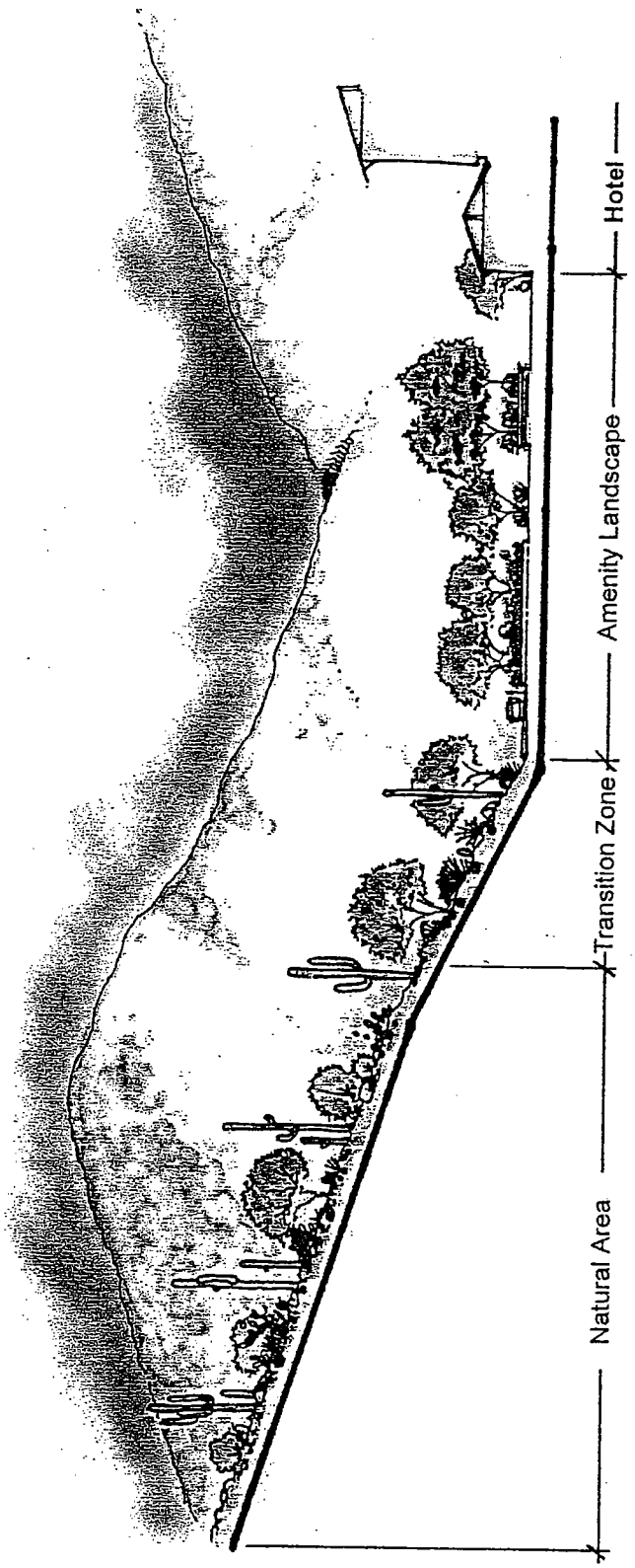
The goal of the Landscape Concept Plan is to enhance the natural environment with amenity landscaping . The landscape plan restores the disturbed natural areas to blend environmentally into the site. Landscaping softens the built environment and minimizes the impact areas. Much of the preserved, restored, and enhanced habitat will provide cover and food to native animal species. The hotel site landscape design will provide a harmonious connection to Tucson Mountain Park and Tumamoc Hill.

The Landscape Concept Plan shall provide a transition to the natural Sonoran Desert with amenity landscaping on the hotel site. The planting plan will blend a desert plant palette and recreate the plant density of the surrounding Natural Sonoran Desert. The Landscape Concept Plan, Exhibit 3.6-A, Transition Zone Cross Section, Exhibit 3.6-B, and Hotel Landscape Entry, Exhibit 3.6-C, captures the feel of the sites Landscape Concept Plan. The plan emphasizes a seamless continuity between the natural and the built environment by utilizing the following design techniques:

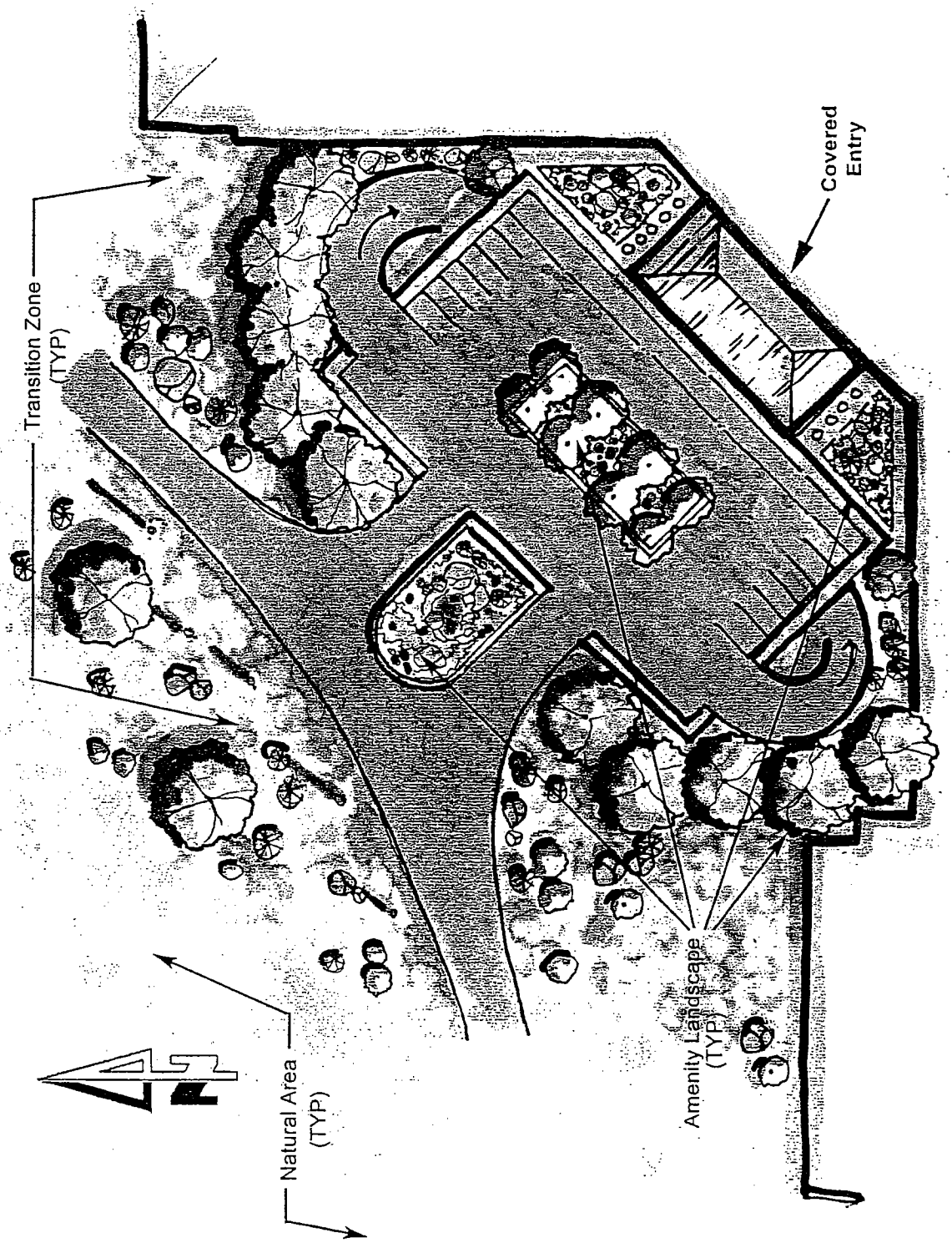
- Provides continuous open space which is visually and functionally linked.



Landscape Concept Plan
Exhibit 3.6-A



Transition Zone Cross-Section
Exhibit 3.6-B



Hotel Landscape Entry
Exhibit 3.6-C

- Emphasizes the use of native, site specific plant species and densities in landscape mitigation by salvaging and transplanting plant materials from disturbed areas.
- Enhances the native character of the views by using harmonious colors which blend into the surrounding landscape.
- Blends all surface cuts by the use of rock staining and "rockeries" (rock retaining structures) and where possible, provides pockets of plantings within the cut slope areas.
- Uses treated reclaimed water for all golf course irrigation.
- Maintains existing drainage patterns where possible.
- Minimizes disturbance to existing offsite to onsite viewsheds.

The development process will be monitored to assure that the final development resembles a native Upland-Sonoran Plant Community integrated with the Riparian Plant Communities per development standards.

3.6.2 Impacts and Solutions

The proposed development site location is designed to avoid areas of high vegetation density. Development is proposed on the flat low bajada area which is also the area of low saguaro counts. Most of the Xeroriparian habitat will be preserved. The exception is that the xeroriparian habitat of the middle wash will be compromised. This wash will be mitigated with bank improvements and revegetated with native plant materials.

The loop access road will cross the west branch of the Anklam Wash in two places. These access points will be mitigated with native-like vegetation to blend with the adjacent xeroriparian habitat vegetation. Plant mitigation will be designed to reduce the visual impact that the road may have from off-site viewsheds.

At the wash crossings, there will be a low profile arch structure placed to permit traffic to pass while allowing continued wildlife migration and water flow. This construction will allow the channel bottom to remain in its natural state. All disturbance areas resulting from culvert construction will be mitigated to original vegetation density.

3.6.3 Standards for Minimizing Impact

Sensitive master planning and site planning shall be employed to optimize the integration of the hotel and golf course uses into the site's natural features. The following vegetation mitigation standards will be implemented in the impacted areas.

3.6.3.1 Mitigation to visual and ecological impacts shall be implemented through habitat enhancement, restoration, and creation. The mitigation of affected areas will result in no net loss of xeroriparian habitat density within the hotel and golf course zones.

3.6.3.2 All undeveloped disturbance areas will be mitigated in accordance with the Pima County Landscape Ordinance. Additional mitigation areas may include sparsely vegetated upland areas adjacent to golf course uses, golf course fringe areas, and roadways.

3.6.3.3 Transitional amenity landscape areas, i.e. those areas impacted by the construction of the resort or golf course, shall be planted with xeriscape plants.

3.6.3.4 All areas disturbed during construction shall be planted or hydroseeded with indigenous plant species to restore pre-existing conditions.

3.6.3.5 There shall be limited construction access and grading to all building sites and golf course areas. Construction vehicles, traffic, yards, storage, and assembly areas shall be restricted to areas disturbed for road or building site construction and shall not encroach into designated biological corridors, buffer easements and natural area.

3.6.3.6 Architecture and golf course layout shall be designed to adjust to terrain and preserve vegetation where feasible to do so and still maintain the functional features of a resort hotel and golf course. The golf course shall utilize integrated golf course management strategies for turf care and pest control as sanctioned by the United States Golf Association (USGA). Golf course areas shall be constructed in a manner so as to create a continuous undulating soft edge of native vegetation adjacent to turfed areas. Where possible, these vegetated edges shall be interconnected with natural areas between sites to provide vegetative cover and movement opportunities for wildlife.

3.6.3.7 Structures and landscaping shall reflect form, color, texture, and line from the surrounding natural landscape. Landscape materials shall be limited to those identified on the Pima County Plant List.

3.6.3.8 During construction, protective natural area controls and easements, where designated, shall be observed. Protective fencing and signage shall be utilized, and temporary construction impacts shall be restored.

3.6.3.9 Site selection and layout for built structures includes the use of native and mitigated vegetation to provide visual continuity and minimal surface scarring. Native plant material will be maintained throughout the project periphery with mitigation restoring disturbed areas. Soil stabilization is provided by plants throughout the property. The majority of the site is rocky enough that soil stabilization is not a major consideration. Washes and extreme slopes will be hydroseeded as needed with a seed mix designed to duplicate the existing vegetative communities and act as a soil stabilizer.

3.6.3.10 A plant salvage preservation plan will be preformed to Pima County Native Plant Preservation Ordinance requirements and will be processed through Pima County at the time of development plan submittal.

3.7 Wildlife

A response from the Arizona Game and Fish Department for any threatened or endangered wildlife is included as Appendix Two. Each of the recommendations in the letter will be adopted to minimize potential impacts to wildlife.

It is the intent of the developer to maintain the ecological character of the area and preserve or revegetate disturbed areas to encourage Sonoran Desert Habitat for existing wildlife. The main wash areas and the biological corridors will be preserved or will be environmentally mitigated to attain the natural habitat conditions. The development zone is limited to 48 acres; therefore 149 acres of the upper bajada, foothills and mountainous areas is planned as natural area. This natural area is rich in habitat that will be preserved and will continue to facilitate the cross-corridor plant cover and movement of wildlife.

According to the Harris Environmental Study, the biological corridors shall be preserved in a natural state. This will allow the continuance of biological diversity for plant and animal communities. The undisturbed natural area will encourage habitat and coverage for many animal species. The biological corridors will also provide opportunities for cross pollination and breeding between genetically similar species. Continuous corridors will encourage animal migrations between Tumamoc Hill and Tucson Mountain Park.

3.8 Soils

This project will be sewered and will not require any septic systems; therefore, a septic application is not pertinent.

3.9 Buffer Plan

The resort hotel site is adjacent to vacant residential property and Tucson Mountain Park. The residential zones are R-1 in the City of Tucson and SR (Suburan Ranch) in Pima County. Tucson Mountain Park is Pima County Institutional Reserve (IR). In accordance with the Pima County Landscape Ordinance,18.73.040, Major Resort zone, which is the closest zone translation for the hotel zone by this Specific Plan requires Bufferyard 'D' between the adjacent park land, and the residential areas. According to the Pima County Landscape Design Manual, Bufferyard 'D' can be a minimum 40' wide band of natural undisturbed desert. As the amount of undisturbed desert around the developed area will be 149 acres, the natural area surrounding the hotel far exceeds the 40 foot natural bufferyard requirements. Transitional and amenity landscaping will be provided to buffer the entry drive and any construction disturbance.

The roadway to the hotel will be lined with a 25 foot revegetated plant and hydroseeded buffer. Emphasis will be placed on planting a desert plant palate that blends into the natural desert and riparian areas where applicable. Salvageable plant materials from disturbed areas shall be used for revegetation. Additional plant materials required shall be selected from Pima County's Low water use, drought tolerant plant list. Planted areas shall be irrigated and maintained by the developer to Pima County requirements.

3.10 Viewsheds

The topography at Starr Pass affords excellent visual buffers between the hotel site and the surrounding properties. The adjacent ridgelines are approximately 400 feet in elevation and visually overshadow and block views of the hotel at even its highest elevation of 110 feet. Due to the undulating foothills in the adjacent properties existing residents have minimal views of the hotel. Most offsite views of the hotel except for direct views from the south property line and southeast corner of the site will be glimpses of the upper stories of the hotel structure. From Anklam Road (Scenic Route) looking south toward the site all views of the hotel are blocked because of peaks and ridgelines. Viewpoints from Starr Pass Boulevard and Players Club Drive show minimal to no visibility of the hotel.

3.10.1 Views and Vistas from Adjacent Properties

The surrounding topography provides an excellent visual buffer from the surrounding neighborhoods and Tucson Mountain Park. The proposed development area is in a depressed or lower bajada location enclosed by adjacent hills and mountains. The viewsheds looking into the property from offsite vary with the terrain. It is anticipated that only the top floors of the hotel will be visible from most offsite viewpoints. Full views of the hotel are from the south and southeast corner of the site. See Photograph Panoramas #'s 4-7 and 1-3 on the Photo Viewpoint Exhibit 2.10-A. Photograph # 8 allows a full view of only the west end of the hotel. Due to elevated landforms, the neighborhoods to the south and east will have minimal views if any of the top stories of the hotel. See Viewpoint #'s 9-21.

Two dominant peaks are located to the northwest of the proposed development site. The offsite views to these peaks will not be impacted by the proposed development. The peaks also offer a significant visual buffer from the northwest. Looking from the northwest down the wash between the ridgelines the top stories of the hotel will be visible. Views toward the Tucson Mountains are not impacted by the hotel because from most view angles, the peaks are visible but the hotel is not.

Two viewsheds have been established: medium and low visibility. From these viewsheds there are only two communities which are within Starr Pass that are affected; Block 12 (Tohono Ridge) and Block 13 (Future Golf and existing casitas). Tohono Ridge is currently under construction. Homes in this subdivision will be custom and due to a hill between this subdivision and the hotel, most residents will have views of only the top stories of the hotel. Views from Golf Casitas may be full but the hotel is in the very distant background.

The Anklam site hotel location provides minimal visibility to offsite residents. The original location as approved by the City of Tucson had a higher visibility impact than the current site location, which is tucked back between two ridgelines of the Tucson Mountains.

3.10.2 Visibility Areas from Off-Site Locations

3.10.2.1 High Visibility Viewshed

High visibility category of the hotel will be primarily of the top floors. The top floors are the most likely aspect of the hotel which may be visible from offsite viewsheds. Views from the road behind Starr View Apartments are in the high visibility category of the hotel. This view area is approximately one-half mile east of the site. Photographs from Exhibit 2.10A which illustrate High Visibility Viewsheds are 1-10, 12-16, and 21-27.

3.10.2.2 Medium Visibility Viewshed

Within the Mediam Visibility Viewshed Range, the property owners will have a more encompassing view of the hotel but will include the top and middle floors. Their viewsheds will not be limited to the top floors of the hotel. Fewer residences are oriented towards this view of the hotel. Fewer properties in the area will fall under the medium visibility category. Photograph #'s 9-10, 12-16 and 21-27 show this Medium Visibility Range.

3.10.2.3 Low Visibility Viewshed

Neighbors within the low visibility viewshed have full view of the hotel. Full viewsheds are from the future access drive into the site. This provides visitors with a sense of arrival. Within this category, there are few areas where there is a full view of the hotel site. Photograph #'s 1-8, and 24-26 show the viewsheds that will have total visibility of the hotel.

3.10.2.4. No Visibility

Viewsheds from existing developments that are blocked by ridgelines or are approximately one-mile or more from the proposed development site will not have any view of the hotel. These neighbors are located on the east side of the site or on the south side of Starr Pass Boulevard. These subdivisions include parts of Eagle's View, all of Fox Hideaway, Tucson Park West #3 and Quail Point. See Photograph #'s 11 and 17-20 for those view areas that are blocked from visibility of the hotel.

3.10.3 Mitigation Techniques

3.10.3.1 Lessen visual impact by careful siting of buildings. Those buildings that will have more stories in those areas affected by High and Medium Visibility Viewsheds.

3.10.3.2 Utilize trees in the landscape to soften the building form and height.

3.10.3.3 The proposed roadway has the highest offsite visibility. The roadway will be designed into the existing topography and all disturbance areas will be mitigated to the pre-development standards. This treatment should minimize both on and off-site views of the roadway.

3.10.3.4 Other mitigation techniques will include: vegetation density restoration, open space/ buffer zones, and natural color of the resort to match with the surrounding features.

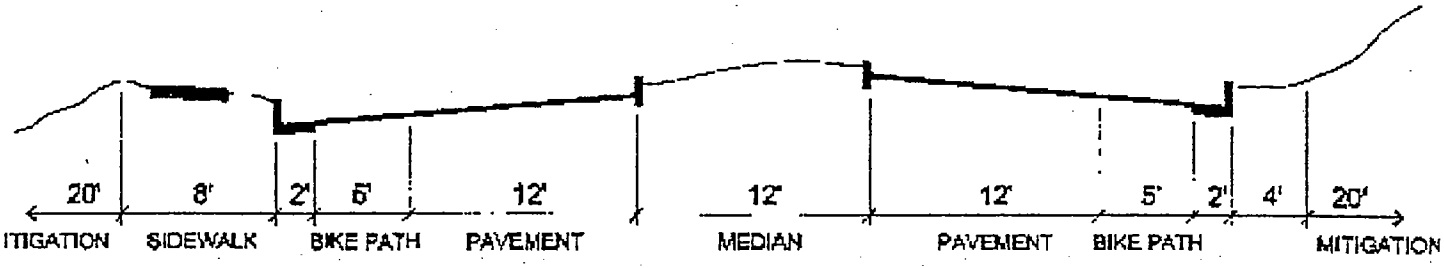
3.11 Traffic

Two entrances are provided for guest and service vehicle access. The circular roadway was designed to minimize visibility of the steep slopes behind the convention center. One access only would have required a parallel or multi-lane access to accommodate service vehicles. In addition, the separation of patron and service vehicles is important to maintain a resort ambiance for hotel guests. Both access points are off of Starr Pass Boulevard, which is fully improved as mentioned in the traffic requirement of the inventory and analysis.

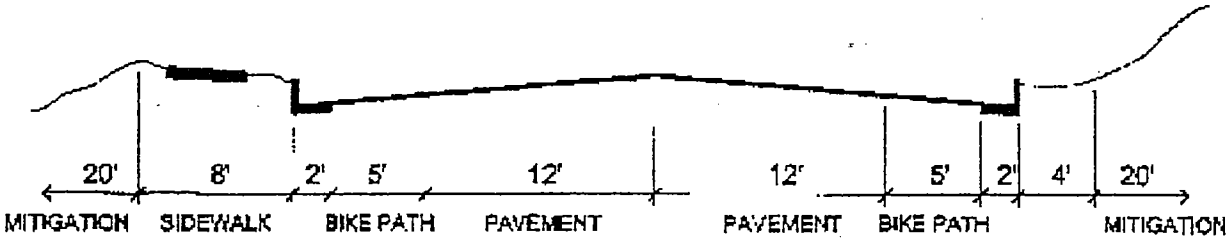
The onsite streets shall be private. The posted maximum speed limit will be 25 MPH. The road is designed with a 12 foot travel lane and a 5 foot bicycle lane in each direction and a sidewalk on one side. (See Exhibit 3.11A)

The minimum impact and ADT's are discussed in the traffic study.

The proposed offsite and onsite streets shall be private at a posted maximum speed limit of 25 MPH. The on-site streets will be designed to a width of 34 feet. The construction of these streets will commence upon approval of the plans. Estimated start date, January, 2000.



TYPICAL ROADWAY CROSS-SECTION A



TYPICAL ROADWAY CROSS-SECTION B

Road Cross Sections
Exhibit 3.11

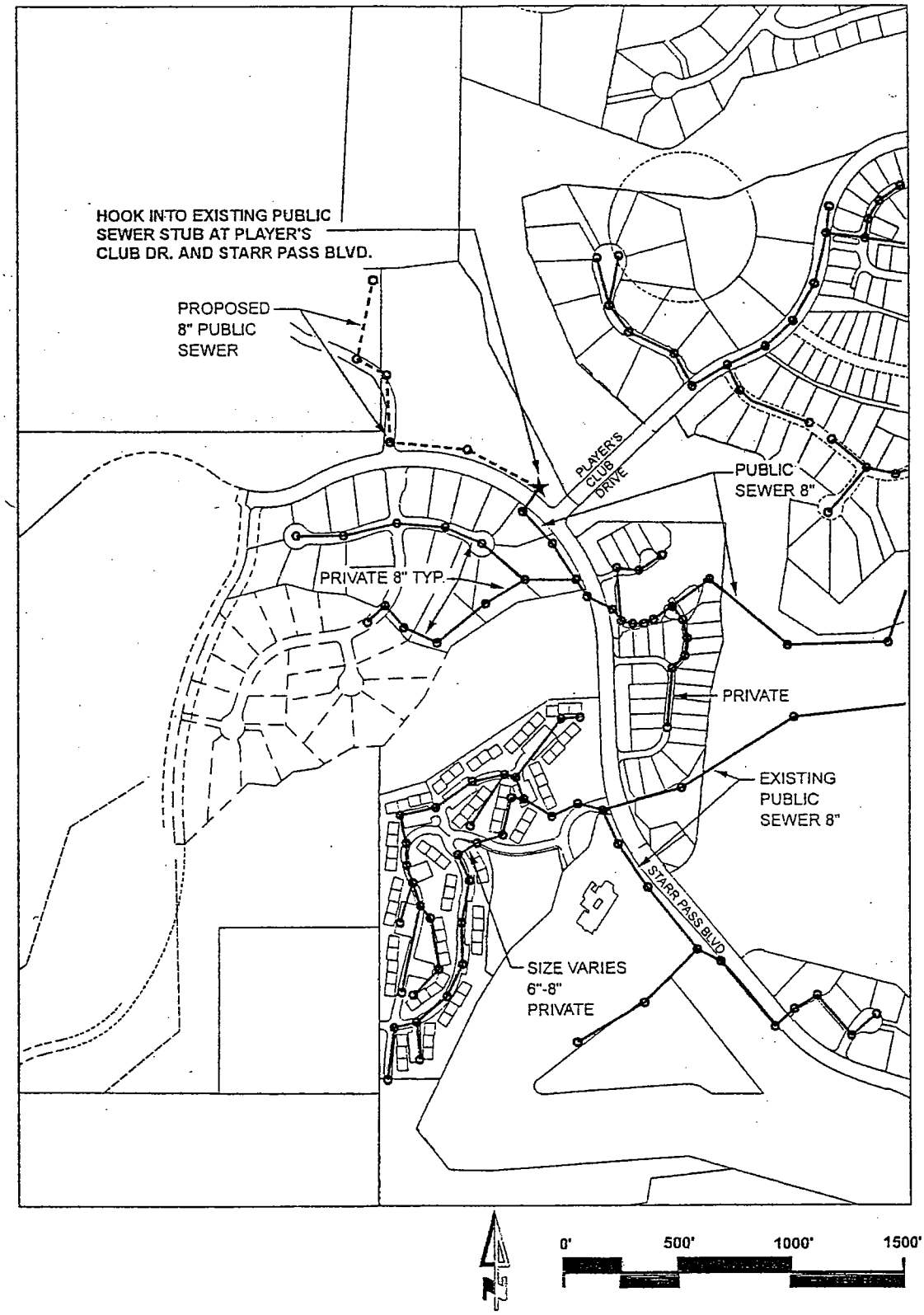
3.12 Sewers

The proposed conveyance system is private from the hotel to the county/city line. From there it will connect to a new public 8 inch line, which is an extension of the existing line located at the northwest corner of Players Club Drive and Starr Pass Boulevard (See Exhibit 3.12A). Easements will be required from the applicant for sewer extension. The public offsite sewer will cross the biological corridor; however, the crossing will be within the road cross section. This will minimize the impact to the corridor at a maximum extent possible.

In order to minimize site disturbance, the hotel is "stepped." The private sewer must be able to serve the lower tier of the hotel where there are no public/private rights-of-way. Therefore, the sewer will cross through the natural site terrain however necessary to accommodate gravity flow. In so doing, the distrubed areas will be mitigated by landscaping.

3.13 Water

A letter of water availability is included as Appendix Seven. According to Tucson Water, the proposed development lies within the exterior boundary of Tucson Water's planned 50-year service area. This assures water supply for the resort hotel development. Water lines will follow the resort roadways wherever possible.



Future Sewers
Exhibit 3.12-A

3.14 Schools

As this is not a residential development, it will not add any demand to the student enrollment; however, the proposed resort will generate significant property taxes (in excess of $1 million per year) part of which will accrue to the School Board.

There are no schools located adjacent to the Anklam property. See school locations on Location Map, Exhibit 2.1B.

3.15 Recreation and Trails

The following proposed trailheads will be developed with Tucson Mountain Park Bond Funding that was passed in 1997. Exhibit 3.15A shows future recreation and trails within the Starr Pass area.

- *Starr Pass East Trailhead* - will be constructed on the eastern boundary of Tucson Mountain Park near the Starr Pass Development. The proposed location is approximately ½ mile south of the hotel site. An access road through the Starr Pass Development will serve the trailhead site. The access will be paved, the trailhead is proposed to include a parking and staging area for equestrian use, pedestrians and mountain bikes. It will have capacity for 35 cars and 5 horse rigs. Future plans may include a park ranger station and controlled after-hours access.

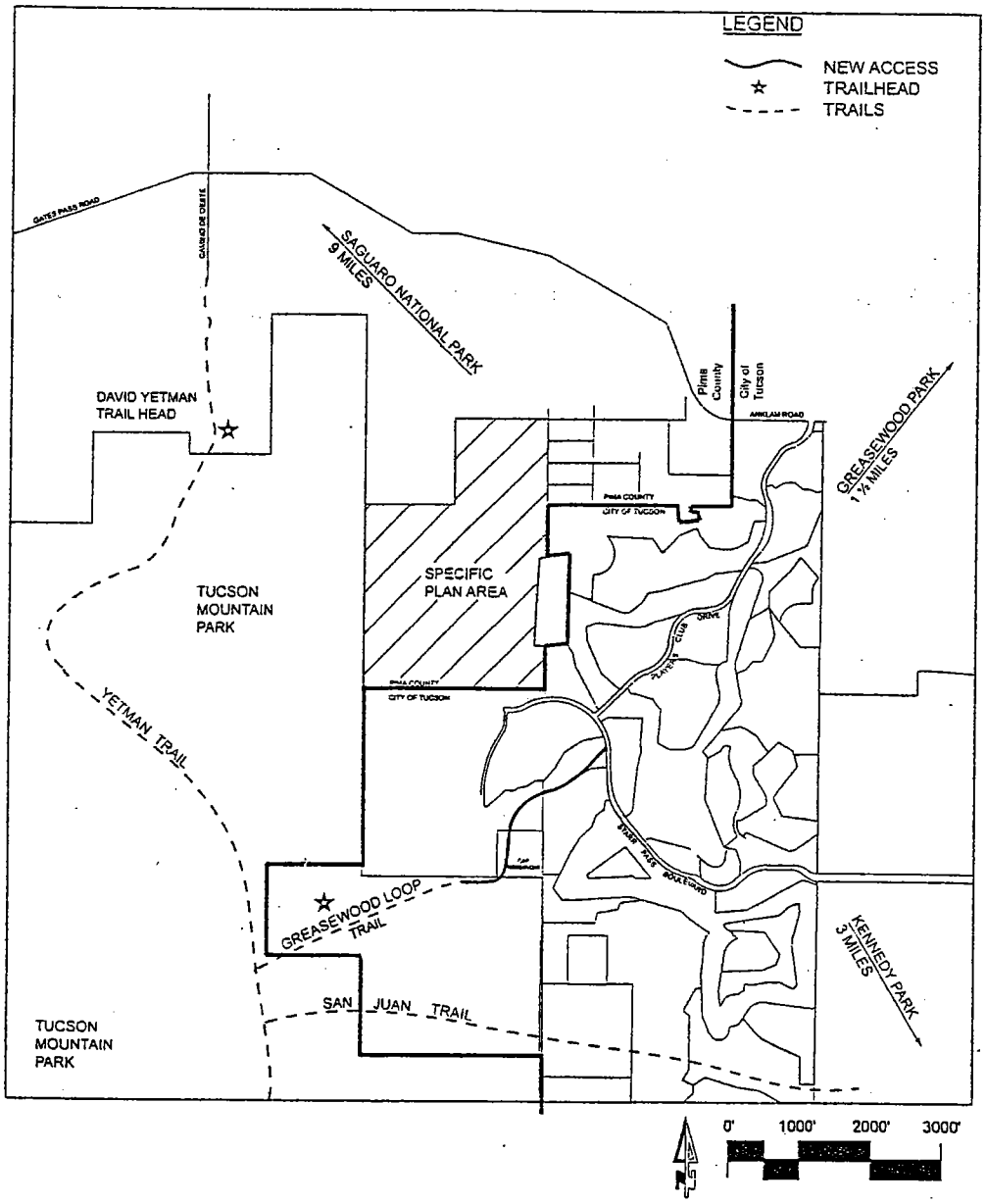
- *36th Street Trailhead* - is located 1 ½ miles south of the Specific Plan site. Pima County Parks and Recreation proposes to construct a staging area at the west end of 36th Street to be used by equestrian use, pedestrians and mountain bikes. Trailhead improvements would clean up the onsite wildcat dumping and would control after-hours access into the park.

- *Kennedy Park Trailhead* - is currently an improved trailhead. It is the only existing trailhead which includes a paved parking lot and horse staging area on the east side of the Tucson Mountain Park. It is also an access point for hikers and mountain bikers.

3.16 Cultural Resources: Archaeological and Historic Sites

3.16.1 Mitigation Measures

The archaeological field survey of the site was completed by a certified archaeologist. The cultural resource inventory identified archaeological sites. This inventory report has been re-



Future Recreation and Trails
Exhibit 3.15-A

viewed by the Pima County Cultural Resource Program Manager. The Manager has noted that relocating the hotel site for archaeological reasons will not be necessary, but that archaeological testing/mitigation measures will be required.

The archaeological sites will require a testing program designed by a certified archaeologist. The testing stage will require field collection data. Information from this stage of data recovery will determine the mitigation measures that may need to be taken. The archaeologist of record will work closely with the Pima County Cultural Resource Program Manager on designing an appropriate mitigation and implementation schedule. Once these documents have been completed and are approved by the Pima County Cultural Resource Program Manager, the archaeological field excavation work may begin. When all field work is completed then a Letter of Clearance is requested from State Historic Preservation Office (SHPO). All correspondance with SHPO will be through the Pima County Cultural Resource Program Manager. This Letter of Clearance will be required prior to obtaining any construction permits. A final archaeological report discussing site findings and field work will be submitted to records of Pima County Cultural Resources, Arizona State Museum and SHPO.

3.17 Air Quality

All dust control measures will comply with Pima County Department of Environmental Quality Standards. Water trucks will be employed to prevent dust during course of construction.

Rock screening and separation activities will be conducted with equipment fitted with spray bars for dust control.

3.18 Other

Water harvesting within the golf course will be performed where feasible.

At this time, it is not determined as to how the hotel site plan layout may facilitate the use of active and/or passive solar.

3.18.1 Development Amenities

Hotel site design shall include: 1) mitigation techniques of the middle wash into a water feature; 2) Hotel landscaping to replicate the feel and affect of a lush mini oasis (per the Pima County Low Water Use/Drought Tolerant Plant List); 4) golf; 5) underground parking structure to minimize on-site paving to roadways, therefore eliminating the large expansive pavement scars of above ground parking; 6) building materials and design elements that will blend the hotel structure into the natural background; 7) building layout techniques which follow the natural topography 8) varying the building heights to follow the natural rhythm of the on-site foothills and mountains; 9) per agreement, the developer is conveying 149 acres of natural area upon approval of

the Specific Plan; 10) preservation of the biological corridors, as much as practical; 11) spa for health and relaxation; and 12) convention facilities will be made available for public contract; 13) building layout and design to give the hotel a residential feel; 14) golf for public use.

3.18.2 Development Impacts

In summary, the impacts that the development will have on onsite/offsite properties is that: 1) traffic flows will increase from their existing condition; however less than the originally approved traffic study; 2) wildlife habitat within the hotel site will be relocated; 3) there will be areas where grade cuts will require mitigation with retaining walls and engineered slope treatments; 4) there will be areas where the hotel, although tastefully designed, will be visible from offsite properties because of height; and 5) the loop ingress-egress to the site requires the crossing of the Biological Corridor.

3.18.3 Specific Agreements

A Development Agreement between Signature Properties International L.P. and Pima County will clarify the Enhancement Fees and the conveyance of the 149 acres of natural area to Tucson Mountain Park.

A Hillside Development Zone variance will be processed concurrently with the Specific Plan document through Pima County Board of Supervisors.

3.18.4 Public Services

The project will be designed and constructed at no cost to the public. The interior street system will be private. No public funds will be used for their construction and maintenance.

Governmental fees will be charged for sewer and water. The resort hotel will pay monthly sewer user fees to Pima County which will provide for the cost of sewage treatment incurred by Pima County. Sewer connection fees will be charged as each structure is built.

Domestic water to the site will be serviced by Tucson Water Company. The appropriate fees will be charged for service connection as the project is built.

While Starr Pass is in the City limits, Starr Pass employs additional off-duty police officers to provide extra security to the area. Private security would provide protection to the hotel, as well. The hotel will also have its own internal system of security.

Currently, the proposed hotel is not in a designated fire district. However, the Northwest Fire District will annex the entire 197 acres into their system, if requested. Other public or private Fire Departments can serve the hotel under a private contract. The determination of which provider will be used will be made prior to the first public hearing. (See Appendix 8, Northwest Fire Letter)

Garbage services for the resort hotel area will be privately contracted and paid for by the hotelier.

4.0 DEVELOPMENT REGULATIONS

4.0 DEVELOPMENT REGULATIONS

For the purposes of this document, the regulations as defined below shall supersede the Pima County Zoning Code. Interpretation of these regulations is the responsibility of the Pima County Zoning Inspector. Terms and Definitions used in this Specific Plan shall mean those defined in the Pima County Zoning Code at the time of approval of the Specific Plan by the Board of Supervisors except as otherwise defined or subsequently amended.

4.1 Specific Plan Zoning

The Specific Plan is divided into three primary areas: the hotel zone, the golf course zone and the balance will be set aside as a natural area.

Hotel Zone - 40 acres
Golf Course Zone - 8 acres
Natural Area – 149 acres

The hotel zone will include the hotel, onsite pedestrian and traffic circulation, onsite below ground parking and the accessory uses as mentioned in the Preliminary Development Plan Section *(See Section 3.2)*. The golf course zone will include golf cart paths and golf holes. The Natural Area will allow only natural open space use.

Where a conflict arises in the interpretation of the Specific Plan Regulations, or where an issue has not been addressed, those regulations of the Pima County Zoning Code that are most closely related to the designated land use categories shall apply as follows:

Hotel (H) Equivalent is the Major Resort (MR) zone, Chapter 18.59 of the Pima County Zoning Code.

Golf Course (GC) Equivalent is the Golf Course (GC) zone, Chapter 18.40 of the Pima County Zoning Code.

For the purposes of this project, the resort hotel and the golf course services may cross over the zone areas. For example, a golf cart path may cross through the hotel zone and there may be golf course club house and restroom facilities provided within buildings associated with the hotel. These may be typical circumstances where hotel and golf course uses may cross over.

4.1.1 Hotel (H)

4.1.1.1 Permitted Uses

a. Hotel

b. Accessory uses may include:

1) Convention facilities, such as conference, banquet and detached lodging facilities

2) If minor boundary adjustments between H and GC designations are necessary, then golf course would be allowed

3) Other recreational facilities, such as health club, spa, tennis facilities, swimming pools, operated as ancillary to the hotel

4) Food and liquor-licensed facilities

5) Specialty commercial uses (retail)

6) Support facilities, such as administrative offices, laundry, and employee facilities

4.1.1.2 Development Standards

a. Hotel

1) Maximum Site Area: 40 acres

2) Maximum Site Density: one guestroom per 2,310 square feet of site area

3) Maximum Building Height: Pursuant to Height Zones, as defined on Exhibit 4.1-A

4) Maximum Building Coverage: 33% of the site area

5) Minimum Site Setbacks: varies
Perimeter Building Setbacks: 50 feet from existing property line, of the 197 acre parcel. Building Setbacks to exceed 250 feet from center line of west branch of the Anklam Wash and 50 feet from all other property lines.

6) Off street parking to be provided in an onsite underground parking facility and offsite (employee) parking, 1.15 spaces per guestroom will be accounted for in structured parking

and with limited on grade parking. (Employee parking will be provided offsite but within the Starr Pass Master Plan area, at a minimum of 0.19 stalls per guestroom.) Golf course parking shall continue to be provided at the existing Starr Pass golf club house.

7) Exterior Lighting: In accordance with the Buffer Overlay Zone regulations, Chapter 18.67 of the Pima County Zoning Code.

8) Signage: Signage for the Resort shall be within the City of Tucson limits and will conform to their regulations for approvals and permitting requirements. All other onsite signage will conform tp Pima County Sign Code regulations (Chapter 18.79).

9) Landscaping, buffering and screening will comply with Chapter 18.73 (Landscaping Standards).

4.1.2 Golf Course (GC)

4.1.2.1 Permitted Uses

a. Golf Course

b. Accessory Uses

1) Accessory uses shall be operated primarily for the resort guests
2) Practice range
3) Maintenance buildings
4) Recreational facilities

c. Specialty commercial uses that are determined by the Zoning Inspector to be a related or supporting use

d. Hotel (H) if minor boundary adjustments between H and GC designations are necessary, then hotel would be allowed.

4.1.2.2 Performance Standards

The performance standards listed in Section 18.59.030 of the Pima County Zoning Code shall apply for the golf course, with the exception of off-street parking which will be met at the existing offsite club house subject to a cross jurisdictional agreement between the City and the County.

4.1.2.3 Golf Course Development Plan

The Golf Course Development Plan shall be prepared in conformance with the requirements of Section 18.59.040 except as otherwise modified in this Specific Plan. A Type 2 grading plan shall be conceptually consistent with the Specific Plan and shall also be prepared in accordance with Section 18.81.020 of the Pima County Zoning Code and submitted to the Pima County Department of Transportation for grading permit issuance.

Prior to the issuance of grading plans for the golf course, a detailed mitigation plan shall be submitted for County review and approval, along with the grading plan, showing the exact areas of encroachment into floodplain and floodway of all impacted on-site washes.

4.1.3 Natural Area (NA)

1. Permitted Uses:

   a. Natural Area

4.2 Other Ordinances

4.2.1 Comprehensive Plan

The project lies within the Tucson Mountains-North Half Sub-region of the Pima County Comprehensive Plan. The land use classification for the Starr Pass Resort Hotel site is "RT" (Resource Transition). According to the Comprehensive Plan, MR (Major Resort) is allowed within this land use designation. (See Pima County Comprehensive Plan Section 2.3.1)

4.2.2 Riparian Ordinance

There are Class I and Class II Habitats within this Specific Plan area. (See 2.8 Vegetation for specifics)

4.2.3 Buffer Overlay Zone Ordinance (BOZ)

The plan <u>exceeds</u> the 50% set-aside under both the current ordinance and the proposed ordinance revision which is scheduled to be heard at the Board of Supervisors meeting of May 19, 1998. The ordinance revision proposes that golf course shall not be allowed as acreage counts toward the 50% set aside area. The 50% set aside is proposed to be natural area. The Specific Plan site meets this criteria with 60% of the site being set aside as natural area. (See Section 3.4, Topography)

4.2.4 Hillside Development Zone Ordinance (HDZ)

The maximum cut is 25 feet and maximum fill is 20 feet. (See 3.3.3 Grading Requirements for specifics)

4.2.5 Native Plant Preservation Ordinance

This project shall be designed in conformance with the Native Plant Preservation Ordinance (Chapter 18.72 of the Pima County Zoning Code).

4.3 Design Guidelines

All design elements will be in conformance with Pima County Zoning Code, Chapter 1865, the Bufferyard Overlay Zone, BOZ.

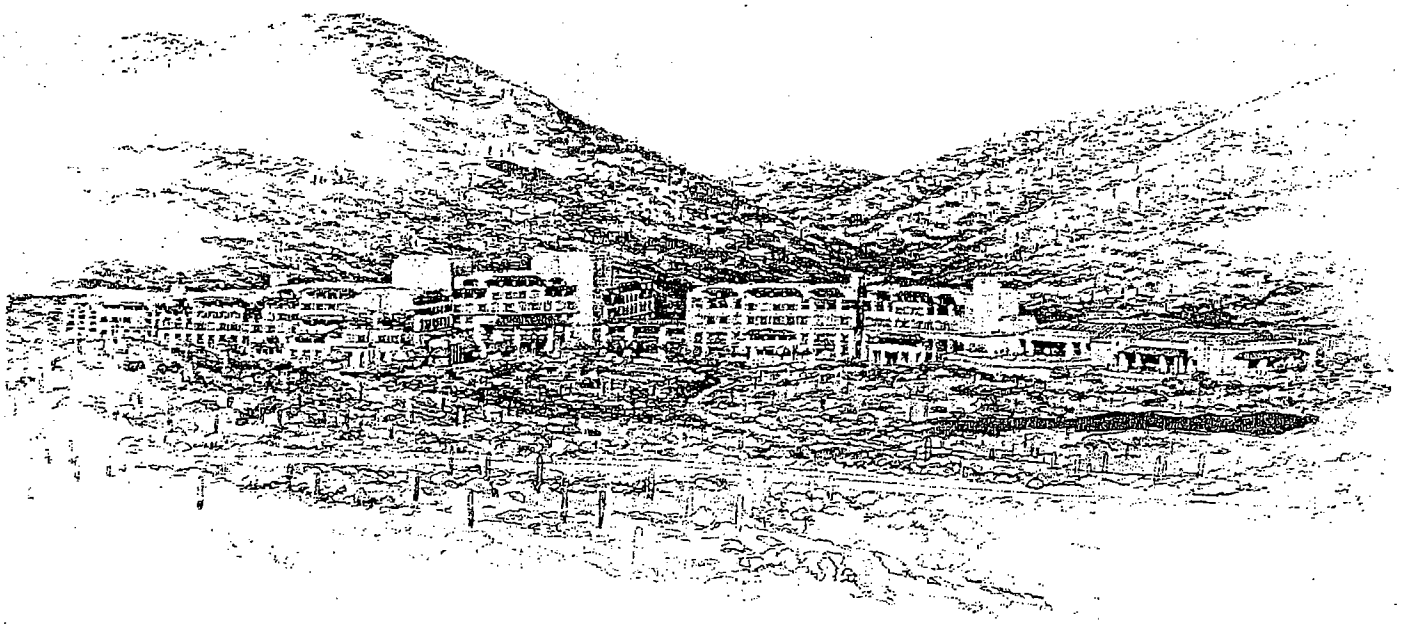
4.3.1 Building Layout

The hotel buildings have been carefully sited and configured to fit into the existing topography at the base of the Tucson Mountains, with the goal of minimizing extensive earthworks and retaining as many of the existing site features as possible.(See Exhibit 4.3-A)

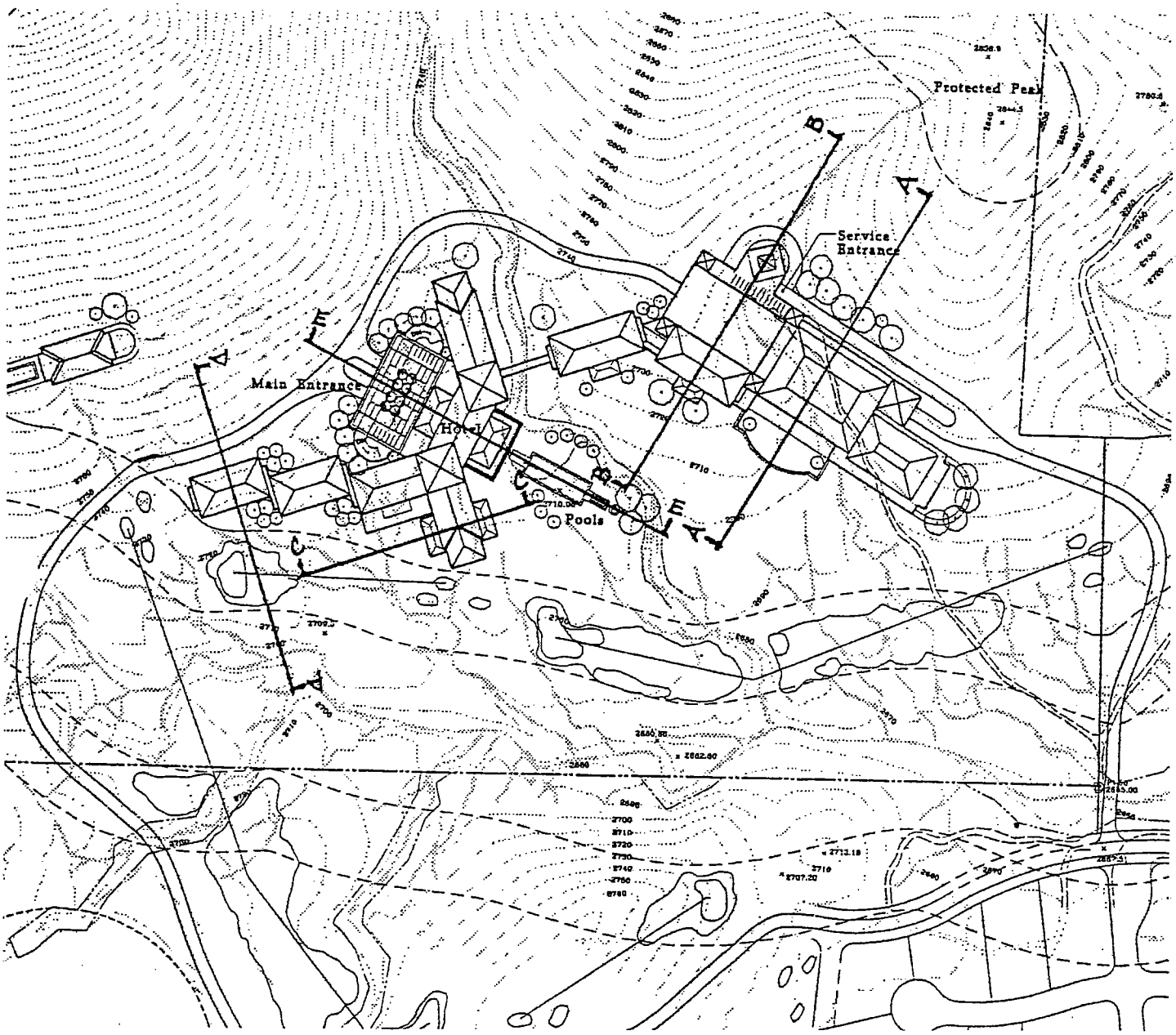
The footprint and orientation of the buildings reflect the existing site contours and characteristics. For example, the feature bridge spans an existing arroyo near the middle of the hotel, allowing hotel guests views up and down the mountain valleys and an overview of the undisturbed river wash below.(see Exhibits 4.3-B and 4.3-C)

The hotel and conference center have been divided into two discrete components in order to reduce the buildings' visual mass. The guest room wings are deliberately segmented and offset to modulate the building facades and to accommodate a series of stepped building platforms which ascend the base of the mountain slope and parallel a large, natural arroyo feature and biological linkage.

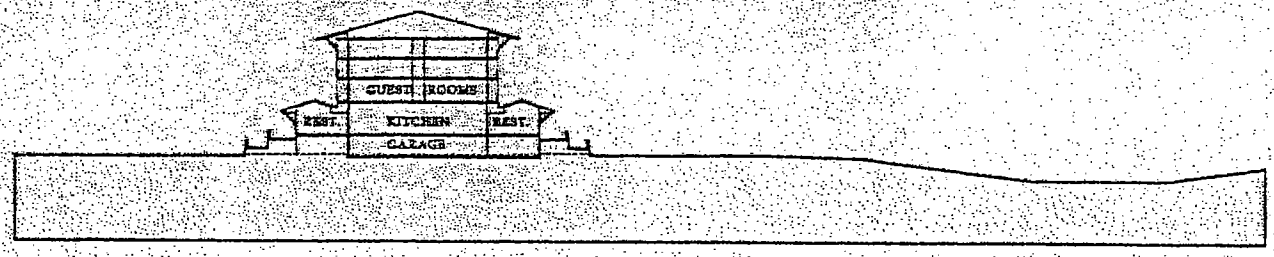
The main hotel building is tiered, with its high point in the center and with shorter guestroom wings that step down into the surrounding land forms as lower elements at the building's perimeter. Consequently, when viewed from the existing surrounding residential neighborhoods and the Starr Pass Boulevard approach road, the hotel's silhouette is lower than the skyline created by the Tucson Mountain Park Range to the north and west.



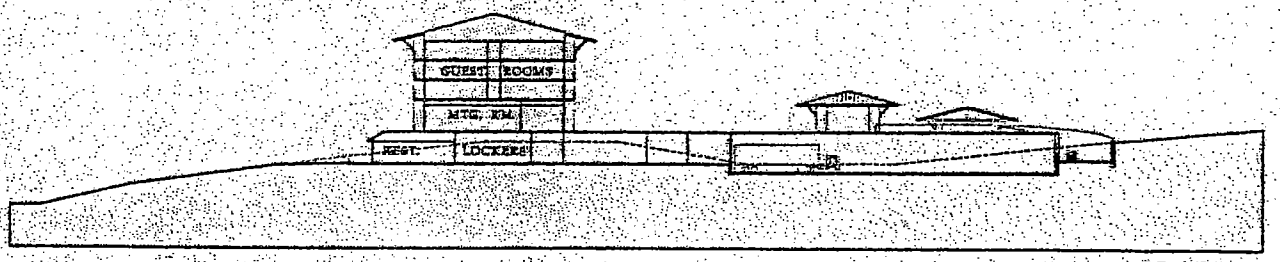
Resort Perspective
Exhibit 4.3-A



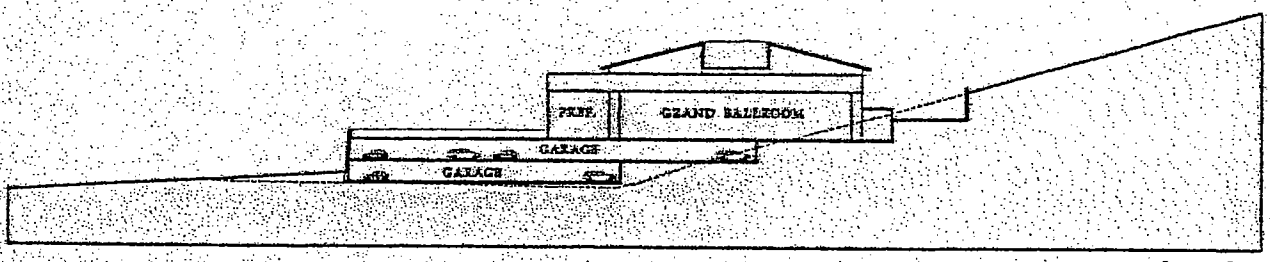
Building Footprint
Exhibit 4.3-B



C-C

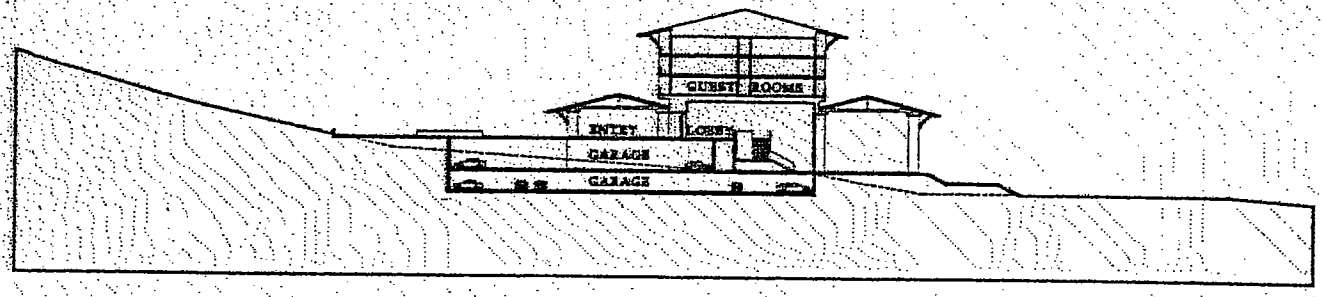


B-B

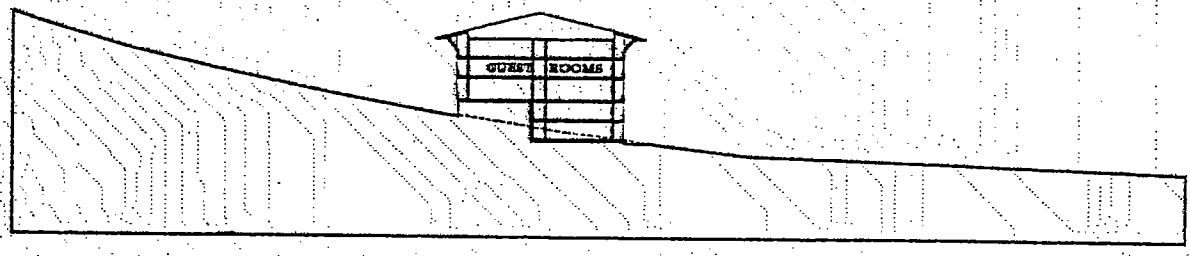


A-A

Building Sections
Exhibit 4.3-C



E-E



D-D

Building Sections
Exhibit 4.3-C Continued

4.3.2 Colors and Materials

Building materials and colors will reflect the natural elements onsite and will implement traditional southwest architectural forms. Windows and exterior doors will be recessed into thick, desert sand-colored stucco walls. (See Exhibit 4.3-D)

Pre-cast concrete and stone cladding at portions of the building base will be constructed from the natural rock onsite or from the region.

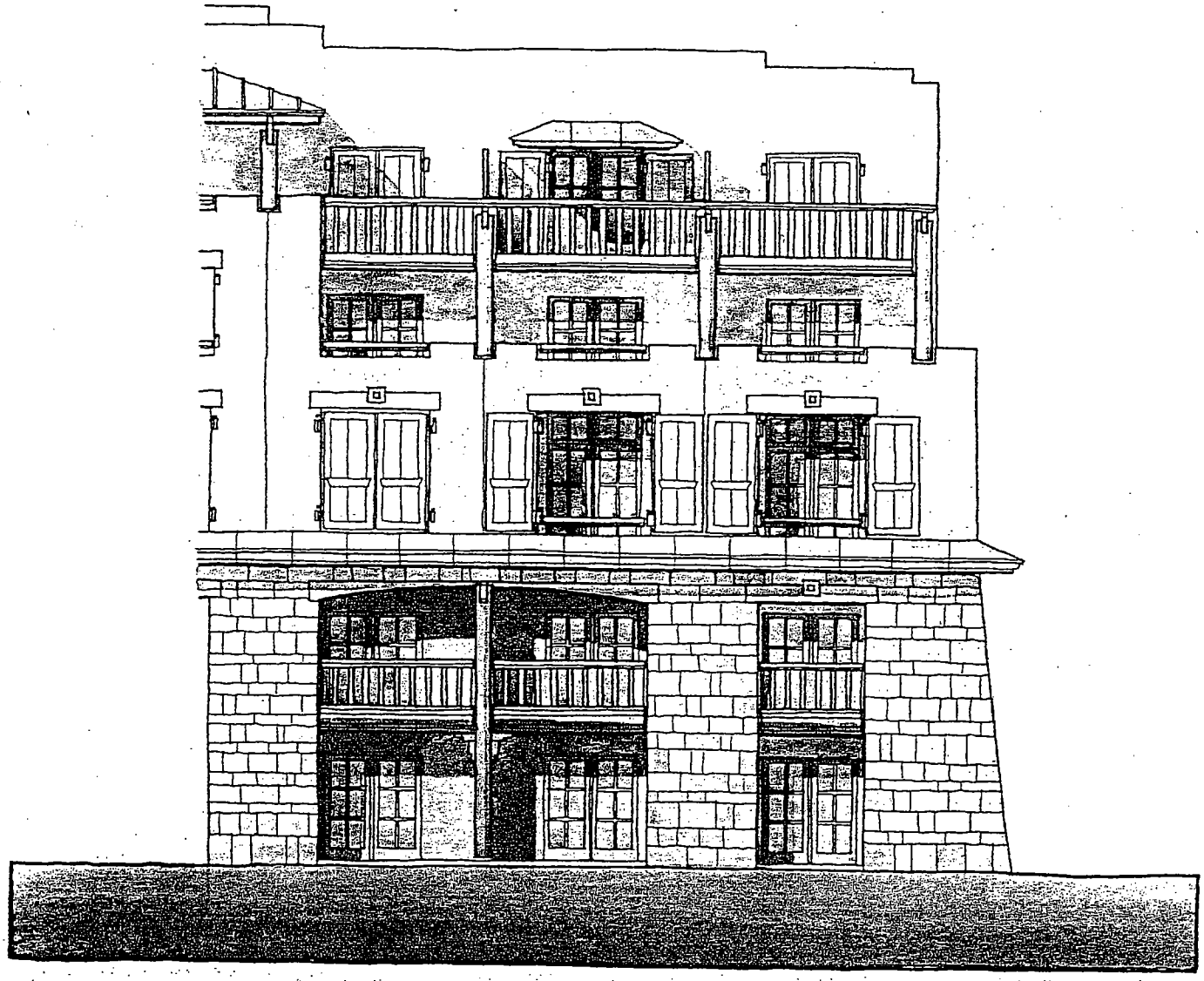
Flat clay tile roofs, painted trellises, railings and shutters will enliven the building facades with color in the way that the blooming of the desert cacti in Spring enrich and variegate the desert scenery.

4.3.3 Landscaping

Care shall be taken to maintain the existing desert ecosystem within the site and surrounding the resort. The existing flora and fauna will be integrated within the site landscaping and left largely undisturbed where possible.

New plant materials and landscaping will be chosen purposefully to coordinate with the existing site landscape. Salvaged plants from areas disturbed by construction will be replanted and become a part of the overall Hotel landscape.

Most car parking will be concealed beneath the buildings. Limited above-grade parking will be designed to fit discretely into the landscaped entry plazas.



Building Elevation
Exhibit 4.3-D

5.0 Specific Plan Implementation

5.0 SPECIFIC PLAN IMPLEMENTATION

The purpose of this section is to identify phasing of the project and procedures for administration of the Specific Plan. The Starr Pass Hotel Specific Plan will be a single-phase project. Detailed engineering plans and development plans must be reviewed for conformance to this Specific Plan, interjurisdictional review procedures, and other applicable codes, and approved prior to initiation of construction activities. Their sequence is shown in the table below.

5.1 Order of Implementation

5.1.1 Initial construction of the two hotel access roads, including provisions for water service, reclaimed water, sewer service and primary utilities (electric, gas and telephone).

5.1.2 Construction of the hotel.

5.1.3 Construction of the golf course.

5.1.4 Complete construction of the access roads, including curbing, paving, and landscaping.

5.2 Implementation Schedule

5.2.1 Access roads

- Start construction
- Complete construction
- Hotel
- Start construction
- Complete construction
- Golf Course
- Start construction
- Complete construction

5.3 Implementation Program

The implementation program for the Starr Pass Hotel Specific Plan is anticipated to be completed by early 2001 with opening of the resort for business. Full implementation of the Environmental Resources Plan and implementation program will continue until the plan goals are met. The calendar for the annual Environmental Mitigation Plan Monitoring System described in the Environmental Resources Plan will commence upon completion of construction of the various components of, i.e., the hotel, golf course, parking lot, etc.

5.4 Specific Plan Implementation Sequence

5.4.1 Specific Plan Approval

5.4.2 Survey Boundary Map

5.4.3 Specific Plan Ordinance

5.4.4 Hotel Development Map

5.4.5 Golf Course Development Plan

- Grading Plans
- Mitigation and Monitoring Plans
- Water Plan
- Reclaimed Water Irrigation Plan
- Access Drives
- Cultural Resources Mitigation Plan

5.4.6 Building Permits

5.4.7 Construction

5.5 Archaeology

A report discussing the results of the archaeological field survey are submitted under separate cover to Pima County Cultural Resource Manager. A mitigation plan for the assessment and treatment of the identified sites will be prepared for review and approval by the Pima County Cultural Resources Office and the State Historic Preservation Office (SHPO).

(Reference: Pima County Comprehensive Plan 1992. Natural & Cultural Resources: Ar chaeological & Historical Policies

- **Professional Consultants:** A professional archaeologist working under a State Antiquities Permit or a professional architect, as appropriate, will prepare all documents and conduct all activities relevant to the identification, evaluation, preservation, or data recovery of archaeological and historic resources.

- **Review:** These documents will be submitted to Pima County for review. Additional review may be required from the State Historic Preservation Office (SHPO), federal and state regulatory agencies as appropriate, and other professionals.

- **Off-Site Development:** Cultural resources affected by ancillary construction to support the specific plan area will also be investigated and treated in the same manner as cultural resources within the Specific Plan boundaries.

- **Site Inventory:** Field survey will be conducted to inventory all archaeological and historical sites and buildings affected by the proposed development. These sites will be recorded with the Arizona State Museum (ASM) in accordance with guidelines established by the ASM and SHPO.

- **Site Evaluation:** Sufficient testing and evaluation will be conducted to establish the significance, nature and extent of the archaeological and historical sites, with the objective of obtaining salient information for the development of a research design and cost-effective data recovery/documentation plan.

- **Research Design/Mitigation Plan:** A research design and mitigation plan will be prepared that encompasses the affected cultural resources. The research design shall identify productive areas of scientific investigation that may be pursued and provide direction for the development of the mitigation plan. The mitigation plan will detail strategies for the management of the affected sites and includes standards for further testing sampling strategies, documentation, data recovery (excavation), preservation and protection, and curation, analyses, and report preparation. An agreement for the treatment of human remains shall be developed with the ASM and appropriate cultural groups pursuant to ARS □41-844 and ARS □41-865.

- **Phased Development:** If the specific plan development is phased, a mitigation plan and plan of work shall be developed for each planning area that contains cultural resources. In the event that an archaeolotical site spans more than one planning area, a single plan of work shall be prepared and implemented for the entire archaeological site.

- **Implementation of Mitigation/Data Recovery Plans:** The approved mitigation plans will be implemented prior to any ground disturbing activities for development. Documentation will be provided that the relevant portion(s) of the mitigation plan has been implemented and the field work completed prior to or at the time of application for a grading permit. Analyses, report preparation, and curation are mitigation tasks that shall be completed following the field work phase.

- **Cultural Resource Protection:** No physical disturbance (including artifact collection or excavation) of archaeological or historical sites shall be permitted unless specifically indicated in the mitigation plan. Cultural resources identified for in-place preservation will be protected during development activities. Unrecorded archaeological sites unearthed during construction will be recorded and documented by a professional archae-

ologist. Information on the location and nature of cultural resources will be restricted except as necessary for avoidance and protection.

- **Human Burials:** An "Agreement on Burial Discoveries" will be established prior to archaeological investigations in consultation with the Arizona State Museum and concerned cultural groups that claim affinity to the area. In the event that human remains, including human skeletal remains, cremations, and/or ceremonial objects and funerary objects are found during scientific excavation or construction, ground disturbing activities shall cease in the immediate vicinity of the discovery. ARS 41-844 and ARS 41-865 require that the Arizona State Museum be notified of the discovery of these remains so that appropriate arrangements can be made for the removal, repatriation and reburial of these remains by cultural groups who claim cultural or religious affinity to them. Completion of the approved mitigation program does not exempt the development from compliance with these state laws.

5.6 Administration Program

The administration program of the Starr Pass Hotel Specific Plan will be in accordance with Section 18.90.080 of the Pima County Zoning Code as it currently exists. The Pima County Zoning Code provides criteria and specifies the process to be followed for any changes to the Specific Plan.