



**Santa Cruz County
Community Development Department**

Planning - *Rick Hindmann*
Parks - *Ron Alvarez*
Airport - *Larry Tiffin*
Building - *Robert Banzhof*

Mary Dahl, Director

TO: Planning Commission
FROM: Mary Dahl, Director
RE: Case No. CP-06-10 (Bunn) – Comprehensive Plan Amendment
DATE: July 17, 2006

Case No. CP-06-10 Parcel Nos.: 111-20-003, 111-23-006, 111-28-009A, & 111-28-005:
J. T. Bunn & Company and J.T. & Elizabeth Bunn, as property owners, and The Molera Alvarez Group, as authorized owners' representatives, are requesting a Major Comprehensive Plan Amendment to reclassify 624 acres of land from Ranch (R) to a combination of Low Density Residential (LDR), Medium-Density Residential (MDR) and High-Density Residential (HDR). The property is located primarily east of the Union Pacific Railroad tracks and south of Amado-Montosa Road in Amado, Arizona.

The full application and proposed land use map is attached (Attachment A).

Under this proposal, 223 acres are proposed to be designated HDR and 321 acres are indicated to be MDR and 48 acres as LDR. Of the 624 acres, approximately 32 acres are proposed to remain in the Ranch designation as a school site, park site and a "quasi-public" parcel in the extreme southwestern portion of the subject property.

This proposal differs from the one considered by the Commission a year ago in that the developer is imposing a 2,500 residential unit cap on the entire project. The densities proposed are shown on Figure 1 and include 1 residences per acre (RAC) surrounding the existing Rex Ranch, 10 RAC surrounding the proposed park and school sites, 3 RAC to the east and at the south end of the property, and 6-8 RAC in the mid-section. Most of the proposed 2,500 dwelling units would be in the HDR (6-10 RAC) area (≈61%), with about 37% in the MDR (3 RAC) area and the balance of about 2% situated in the LDR area in the north.

Attached to this staff report is a copy of the report prepared last year when the applicant requested a Comprehensive Plan amendment for this same piece of property. That reports contains information salient to this new application in terms of floodplain, water resources, access etc. Commission members are encouraged to review this old report for information that has not changed since last year, but keep in mind that additional information has been provided and what is proposed is different from the application submitted last year.

What has not changed are the characteristics in the Comprehensive Plan describing the Northwest Character Area and the Goals, Objectives and Policies of the Plan. These were included in the 2005 staff report and, as with last year, space has been provided for Commission members to jot notes down when comparing the 2006 Montosa Ranch proposal with the Goals, Objectives and Policies of the Comprehensive Plan.

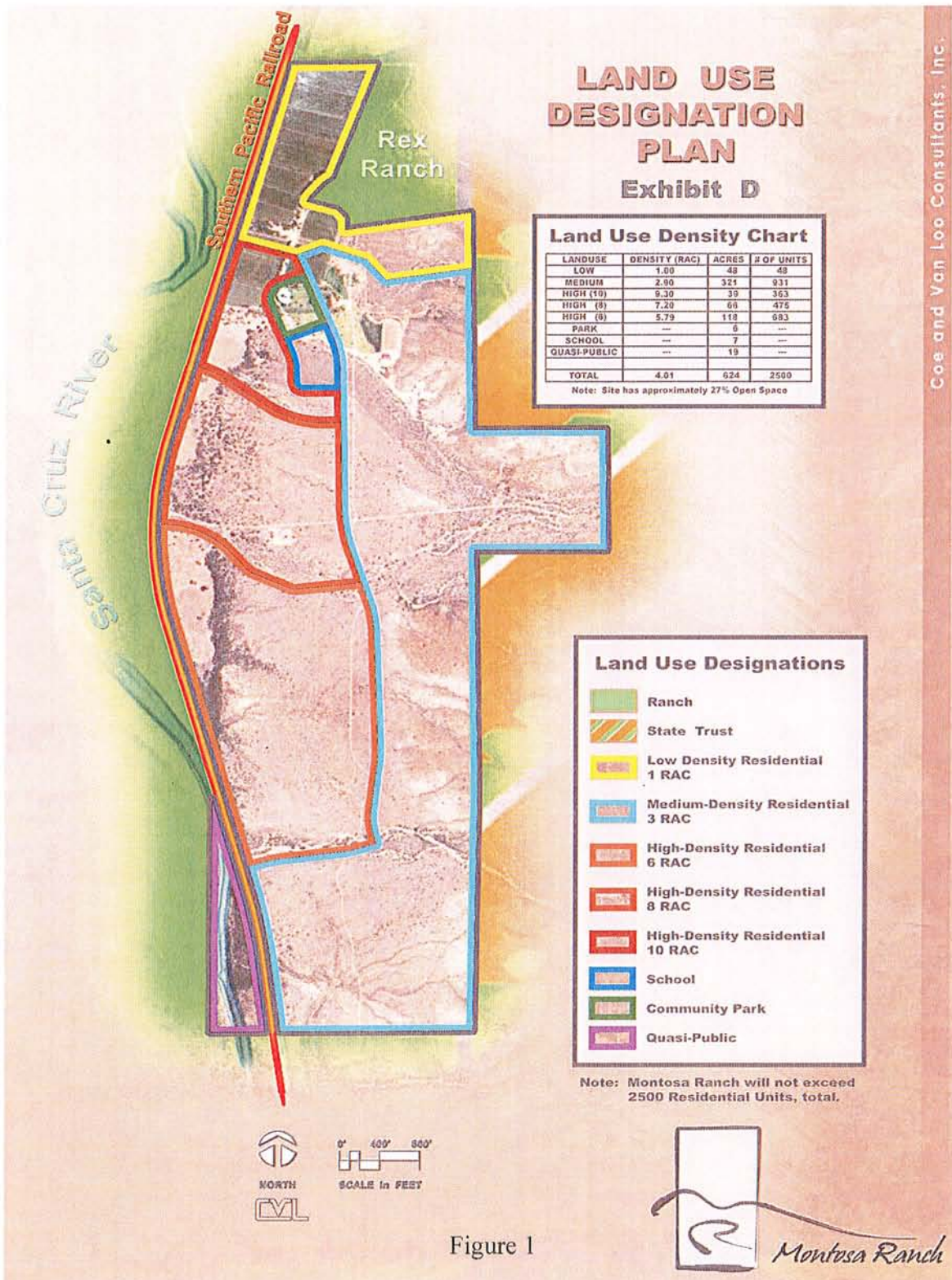


Figure 1

Several documents have been submitted in support of this application. They have been reviewed to the best of County staff's expertise and abilities. Each will be described in this report and comments provided. Some of these reports were sent out to you by separate cover last week and the rest are included with this staff report.

REVIEW OF SUBMITTED DOCUMENTS

Name of Document - Montosa Ranch – March 29, 2006:

This is the core document used to provide an overall description of the project and analyze it in light of the Comprehensive Plan. It provides information on proposed densities and land uses. Note that any references to proposed 0.25 RAC for the LDR area near Rex Ranch are in error. The proposal is for a 1 RAC (lower density) buffer around the Rex Ranch.

The document makes frequent reference to open space, natural site features and scenic views, environmental sensitivities, wildlife corridors, rural ambiance, etc. It quotes from the Comprehensive Plan and includes some of the tables from the Plan.

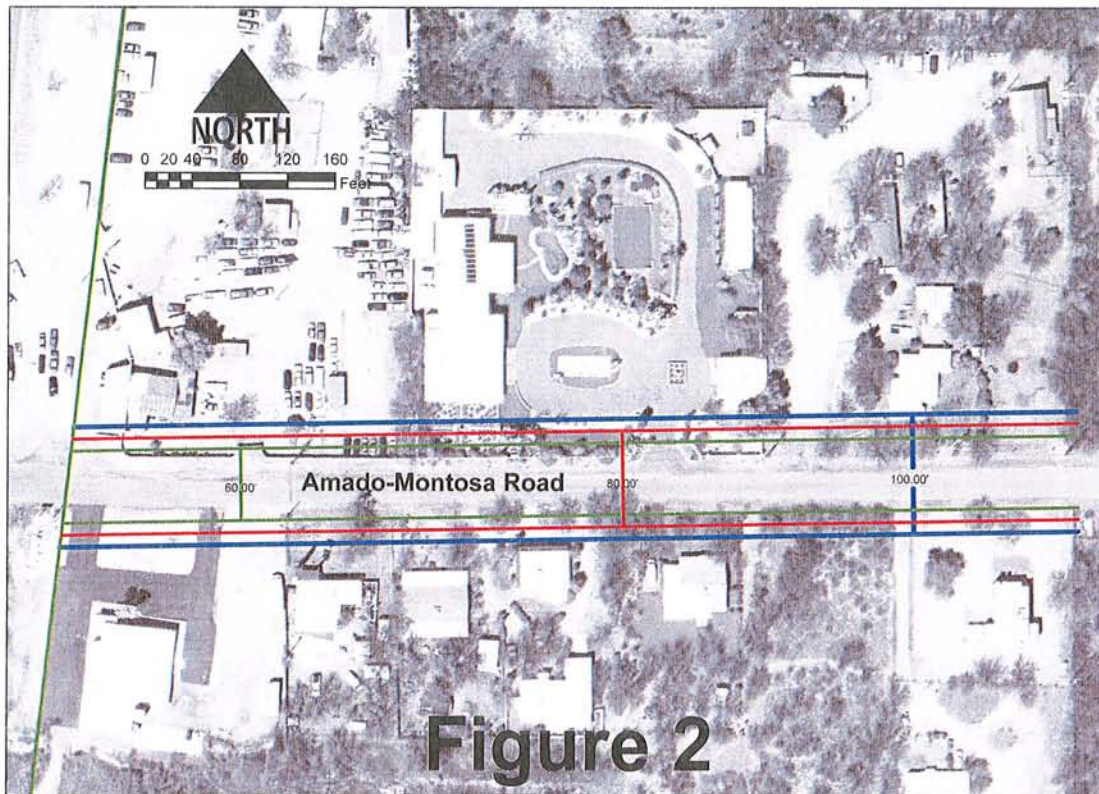
The document lists some of the review criteria and analyses the proposal in light of the selected criteria. The three listed are "Projected Off-Site Impacts", "Impacts to the Conservation, Protection and Sustainability of the Natural Environment", and "Conflicts and Consistencies with the Goals of the Appropriate Character Area".

Projected Off-Site Impacts: Most of this discussion centers on the construction of a four-lane bridge across the Santa Cruz River and provision for a street system to serve the project that will be built to County standards. Also mentioned are an integrated drainage system and open space network. According to the number on Page 7, they are proposing about 26% open space mostly in the existing wash areas. There are some open space areas proposed within the denser areas that would likely be more intensive recreational areas.

For better or worse, a new bridge across the Santa Cruz River will open up State Trust Land to the east for potential development. That could have a significant off-site impact that cannot be quantified at this time due to the pending vote on State Trust Land reform (see Attachment B). Even if the reform initiative is passed by the voters in November, there are at least 2 ½ sections of land that could be ripe for development with the addition of a new bridge and other infrastructure in this area.

The proposal does not discuss in detail what impacts the development will have on Amado-Montosa Road and the East Frontage Road of Interstate 19. The industry standard is that one dwelling unit creates 10 trips per day. That translates into 25,000 trips per day most of which will be along Amado-Montosa Road which currently has an average daily traffic (ADT) count of about 450-500 (as of about five years ago). Within the Rural System description in the Transportation Element of the Comprehensive Plan, 25,000 ADT is classified as a Minor Arterial requiring 110 feet of right-of-way. Amado-Montosa Road right-of-way is 60 feet as it travels east from the East Frontage Road. Figure 2 depicts the various right-of-way widths (80 and 100) and it appears that such a widening project will

require purchase of right-of-way as well as purchase of some structures. Such expenses should reasonably be expected to be borne by the developer. In addition, the use of the County's eminent domain powers would have to be a decision of the Board of Supervisors, although I am not aware of an instance where the County has exercised eminent domain under these circumstances.



Impacts to the Conservation, Protection and Sustainability of the Natural Environment: The document briefly describes a development that will be designed to be “low impact” and one that will protect and conserve washes and vegetation. It also mentions several times that culverts will be constructed at road crossings “to permanently provide the least amount of impact on the natural movement of wildlife.” However, as mentioned in the 2005 staff report, even with a cap of 2,500 dwelling units and 26% open space, there will inevitably be a major disruption of the natural environment. Between providing just over 19 miles of water and sewer line and perhaps an equivalent number of miles of County standard streets and roadways, ground and vegetative disturbance will occur. While the developer is aware of and plans to minimize disturbance in washes under the jurisdiction of the U.S. Army Corps of Engineers, still the main spine road through the site must cross every jurisdictional wash save one in the extreme south end.

Conflicts and Consistencies with the Goals of the Appropriate Character Area: In this section, the developer goes directly to the five goals identified by the NW Character Area Team as being of particular importance in the sub-region. Again, the narrative makes frequent use of terms such as open space, natural landscape, southwest heritage, attractive character and aesthetic appeal. There are no specifics. Refer to 2005 report for more discussion.

The proposal, as mentioned, calls for about 26% open space primarily along existing washes, in the Santa Cruz River floodplain and in some areas that would ultimately be more active open space recreational areas. The latter are evident on Exhibit D of the core document as discontinuous squares of green. This provision for open space demonstrates consistency with the goals of the Comprehensive Plan. Also planned is a network of equestrian easements/hiking trails and a bicycle path. The bike path is proposed to run the complete length of the property primarily along the main spine road. The hiking/equestrian path also runs the length of the property north to south and is intended to connect up to the Anza National Historic Trail. There is also an east-west connector for that recreation use.

Other Goals Relevant to Proper Analysis of the Proposed Amendment: The applicant's narrative also discusses Goal 7 related to wildlife habitat and corridors, Goal 9 related to infrastructure and Goal 20, dark night skies. Regarding Goal 7, they point out that the wildlife corridor map that is included in the Comprehensive Plan shows this area as being "between two possible wildlife corridors." A careful review shows that actually the property is largely within the largest swath identified as a possible corridor. Additionally, in the text of the report that was adopted by reference in the Plan, the Montosa Ranch property is identified as an Area of Special Concern and an area with Medium Species Diversity. The developer plans to mitigate these issues by keeping the existing washes as natural as possible so as to continue functioning as wildlife highways.

They go on to describe a wildlife and bird viewing area adjacent to the Tucson Audubon Society's conservation easement west of the railroad track. Although the document states that this is also the location for a future wastewater treatment plant (page 15), I have been told subsequently that the plant is proposed to be just east of the railroad tracks.

Goal 9 is cited as important to our evaluation in that they intend to be a "self contained comprehensive solution for water, sewer and infrastructure." The proposal includes a new public drinking water system and wastewater collection, conveyance and treatment facility both of which that will be operated by an entity other than the County as the County doesn't have the statutory authority to provide those services. Internal streets and roads and all stormwater drainage structures must also be built by the developer at no cost to the County. These are standard requirements for all new subdivisions.

At least one bridge will be required across the Santa Cruz River to access this new development. There could be environmental permits necessary for construction due to possible alteration of habitat as part of the U.S. Corps of Engineers 404 permitting process.

For the discussion about Goal 20, the developer cites the Pima County outdoor lighting code and points out that a code based on a lumen cap, such as Pima's, goes a long way toward preserving dark night skies. As the Commission knows, we are looking at recommending adoption of a similar outdoor lighting regulatory framework in the future.

The core document concludes by stating that the amendment to the Comprehensive Plan meets its goals and policies by¹:

- **Creating a Land Use Designation that does not conflict with surrounding use and increases its desirability for ordered development.**
DCD Comment: If approved this will be the only area east of the railroad tracks and north of Rio Rico that has a designation other than Ranch. The only areas zoned other than GR in that same region are the mixed-zoned Crowley property across the river from Tubac and the Industrial zoning on the Montosa Ranch property itself. Surrounding land uses include the Rex Ranch Resort, State Trust Land and vacant agriculture or ranch land.
- **Encouraging the construction of community infrastructure.**
DCD Comment: The need for infrastructure in this area is driven by this project and, but for this proposal, such services would not be required or needed. In any event, such infrastructure would be a requirement of subdivision approval regardless of zoning.
- **Creating and preserving future open space.**
DCD Comment: Twenty-six percent open space commitment for the project is significant, but its adequacy would have to be confirmed given the identification of this as an area of special concern for wildlife migration.
- **Diversifying the Santa Cruz County's economy and housing base.**
DCD Comment: Almost all of the development that has occurred in the areas north of Rio Rico has been residential. This has led to an economy driven by the construction trades. Diversification of our economy is needed if we are going to survive the next construction recession. The proposal includes no commercial elements at all which will lead to a continuation of sales tax leakage into Pima County.

Name of Document - Jurisdictional Delineation for Montosa Ranch

This document was prepared by WestLand Resources, Inc. and submitted to the U.S. Army Corps of Engineers to determine which washes on the property are under the jurisdiction of the Corps as representing waters of the United State.

Six unnamed ephemeral washes and the Santa Cruz River were identified as potentially jurisdictional. The potentially jurisdictional acreage ranged from 0.26 acres to 6.4 acres. Total identified area was 16.55 acres.

This is important in development planning because certain permits may be required from the Corps for road building and drainage under Section 404 of the Clean Water Act and when federal permitting is required, then the whole panoply of federal laws gets triggered. This includes the Endangered Species Act (ESA), National Environmental Policy Act (NEPA) and certain cultural resource survey requirements. To date the Corps has not approved this submittal.

¹ Some brief observations on these bullets points is provided as *DCD* (Department of Community Development) *Comment*

Name of Document – Economic and Fiscal Impact of the proposed Montosa Ranch Master Planned Community

This document was submitted to provide information on the projected economic impacts of the Montosa Ranch project. It is based on a project cost of \$581.2 million spread out over a six year construction period. It is also based on the assumption that the average price for all residential units in the project will be \$310,000.

The report has been reviewed and the following observations are offered:

- Annually 921 direct jobs and 614 indirect and induced jobs created with total wages generated of \$37.5 million and \$142.1 million in economic activity over the six years. ***The report fails to acknowledge the enormous contribution to our labor force by non-county residents so that those wages will not by and large be spent here. We are a “net-importer” of jobs meaning that many workers commute from Cochise and Pima County to work here primarily for federal agencies. The report also fails to recognize that much of the economic activity (apart from the construction sales tax) will benefit Pima County and not Santa Cruz. There simply are not the types of services available (i.e. restaurants, motels, gas stations, etc.) in proximity to the project in our County.***
- Revenues from the construction sales tax total \$2.9 million over the six years. ***Construction sales tax is reported according to the actual address of the job site. So regardless of where the point of sale is, these taxes will benefit Santa Cruz County.***
- Spending of construction workers within County limits to total \$69,000 over the six years. ***See first bullet. There are few opportunities for construction workers to spend within County limits near the project site. Overall, the revenues from sales taxes (other than construction sales taxes) reported are overestimated because most sales will occur in Pima County.***
- Annual “construction sales tax” at 0.5% estimated to generate \$484,375. ***Currently our entire ½ cent sales tax for everything generates only \$2,600,000 annually. Is it reasonable to project that this project in construction sales tax alone will generate 18% of current total Santa Cruz County sales tax revenues?***
- Property tax collections annual impact of \$2,993,298. ***This is based on a tax rate of 4.8279 per \$100 of assessed value. The actual tax rate should be 3.305 for an annual impact of \$2,049,100. Note that at the bottom of page 1 it states that the analysis is “based on the current tax structure and rates imposed by the County”.***
- Analysis does not consider the costs to the County associated with providing services to the project. ***According to this report, the streets in the project will be private and, therefore, not require expenditure of County Highway User***

Revenue Funds. As regards County General Funds, there will be expenses associated with providing public safety at a minimum. It costs in current dollars about \$67,000 per Sheriff's patrol officer in Santa Cruz County.

- "To be conservative, a 50% leakage rate was used for sales that will take place outside of the County limits." ***This is not conservative. A very large majority of everyday sales by County residents from Tubac north (and even from north Rio Rico) "leak" into Pima County. Fifty percent is not a reasonable assumption.***
- Increase in the Santa Cruz portion of state shared revenues of \$1.4 million. ***If we assume a population of 45,000 now, then our state shared revenues come out to be about \$89 per person. At their projected build-out population of 6,206 (according to Water Master Study), this new revenue would be only about \$552,334.***

Name of Document – Projected Impact of the Proposed Montosa Ranch Master Planned Community on the Santa Cruz Valley Unified School District

This was reviewed by School District officials and their comments are attached. To summarize, they state that increased tax revenues within a school district does not bring additional funds to the District because their funding is formula-based. Increased local taxes will result in reduced State funding. They also point out that the minimum school site as set forth by the Arizona School Facilities Board is 11-12 acres for an elementary school. The Montosa Ranch plan shows a seven acre school site.

Name of Document – Montosa Ranch Preliminary Water Master Study

This document provides information for the layout of a potable water system to serve the project. It describes a build-out of 1,005 single-family homes and 1,495 multi-family residential units as well as the seven acre school site, six acre park site and 19-acre "quasi-public" site. The report has a residential build-out population of 6,206 persons.

Note that on all the maps in this report, the area proposed for the LDR designation should be referenced at 1 RAC.

The report shows that the site would have to be developed with a two zone distribution system due to topography (total elevation change is about 138 feet across the property). Water will be distributed throughout the project via 8, 12 and 16 water inch lines.

The report states that there are no existing wells on the property, although the existence of irrigated lands on the property belies this observation. Also, there are discrepancies between Table 2 and Table 3 as regards acreages and number of dwelling units.

The report concludes that from a potable water demand standpoint, the built-out average day delivery demand for the project for the water system is 622.98 gallons per minute.

The maximum day demand is 1,115.36 gallons per minute and the peak hour demand is 1,853.94 gallons per minute.

Name of Document – Amado Road Bridge

This short report outlines a scope of work for designing and engineering a new vehicular bridge across the Santa Cruz River. Such a bridge would be a requirement for approval of this development and all costs associated with its construction would be the sole responsibility of the developer or assigns and not the responsibility of the County or the County taxpayers.

The proposal is for a 600-800 foot long, 5-6 span bridge with a clear roadway of 30-32 feet. It will have to be designed based on a 100-year flow rate of 45,000 cubic feet per second in the river.

They are proposing a four lane bridge. County staff is unsure how this statement relates to the 30-32 feet of roadway and unclear as to the justification for the four lanes.

The estimated cost of the bridge structure according to the report is \$4,800,000. The approaches and abutments are estimated to cost \$900,000 with engineering and construction management projected at \$600,000. A \$200K contingency brings the total for the project to \$6,500,000.

Name of Document – Hydrologic Study for Montosa Ranch Near Amado

This report was submitted to the Arizona Department of Water Resources (ADWR) to begin the process whereby the developer can seek to obtain a certificate of 100-year assured water supply for a subdivision in the Santa Cruz Active Management Area (SCAMA). It is unclear if this submittal was a physical availability assessment report or assured water supply application. The report itself references a proposal for a 100-year water adequacy hydrologic study, which is the ADWR program for developments outside of Active Management Areas.

This type of report is reviewed by groundwater hydrologists whose job it is to verify assumptions, review and accept methodologies and ultimately to decide if there is enough groundwater physically and legally available to support the proposed project.

By examining the subsurface geology of a piece of property and analyzing well records, a picture will emerge about the amount of water in storage under the property. Recharge into the groundwater aquifer is also estimated based on stream flow hydrographs and well data. Pumping from the aquifer is another piece of the calculation and often must be estimated if wells are not metered.

In terms of quantity, a couple of conclusions are drawn in this report. However, as I am not a groundwater hydrologist, I cannot evaluate whether these conclusions are supported by the contents of the report.

One conclusion is that the 2,500 residential units have a projected water demand of 1,420 acre-feet per year (page 3). It is not clear if this demand includes the school and park sites water usage nor does it state whether it is based on the 6,202 population figure in the Water Master Study document or the 5,500 population figure in the Economic and Fiscal Impact document. Perhaps it is simply based on an average household usage of 0.568 ac. ft./yr.

Another conclusion drawn is that the average amount of groundwater inflow beneath the property is about 2,700 ac. ft. per year, which exceeds the annual demand of 1,420 ac. ft.

The report also addresses groundwater quality. Most of the constituents reported on fall well below the maximum contaminants levels (MCL) as set by the Safe Drinking Water Act. Unsurprisingly, however, arsenic concentrations were reported at 11 parts per billion (ppb), which exceeds the new federal MCL of 10 ppb. Variability in sampling and test results could result in a requirement to treat for arsenic.

ADWR has reviewed this submittal and has asked for additional information. Due to the project's proximity to the river, ADWR has asked for additional data to make a determination as to whether the projected usage would result in a diversion of surface water flows. It is customary for ADWR to request such data when evaluating projects near surface waters. If it is determined that the projected usage is diverting surface water, then the developer will have to show that they own surface water rights. ADWR needs more information to run their own analysis to see if it supports the conclusion drawn on Page 26 which states in part "...there would be no significant influence of pumping for the project on stream flow in the river."

ADWR has also asked for additional information on their multiple well impact analysis in order for their hydrologists to confirm some of the conclusions drawn in the report.

Name of Document – Hydrology Report for Montosa Ranch

This lengthy document deals with stormwater runoff and design discharges for engineering of drainage structures and roadways. It identifies twelve offsite watersheds that impact the site and sixteen onsite drainages. All of the cumulative design flows result in flow rates of 112 cfs or greater at their respective concentration points.

This report was briefly reviewed by the County Floodplain Coordinator and the following comments were provided:

1. The Pima County Method used to calculate the discharge values (Q_s) appears to be an older version that has been known to underestimate the Q_{100} (peak discharge during the 100 year event) on larger watersheds.
2. There appear to be some split flow regimes onsite that do not appear to be adequately evaluated.
3. There appear to be some problems with the HEC-RAS cross sections that need to be checked.
4. HEC-RAS summary table on the maps do not make sense and some information is missing on the maps.

ANALYSIS

Please refer to the 2005 analysis as pertains to development impacts keeping in mind that the current proposal caps the number of homes at 2,500.

In the Comprehensive Plan, the following bulleted points are listed as evaluation criteria when considering an amendment to the Plan:

- Comparison of the proposed land use with the Plan's designated land use, according to the *Hierarchy of Land Use Designations From Least Intense to Most Intense*;
- Projected off-site impacts, including traffic, public safety and parks impacts and options available to mitigate such impacts;
- Impacts to the conservation, protection and sustainability of natural environment, including, but not limited to, hillsides, riparian areas, public lands, night sky, public lands access, surface and subsurface water and floodways;
- Identifying projected conflicts or consistencies with the goals of the appropriate character area within which it is located and whether any amendments to character area goals should be included in considering the proposed plan amendment;
- The extent to which the proposed amendment accomplishes the goals and objectives of this Plan, as set forth in Appendix I;
- Community outreach efforts undertaken by the applicant; and
- Any other element relevant to proper analysis of the proposed amendment.

The developer, in their core document, addressed some of these and the 2005 staff report gives a County staff perspective on increasing the densities on this particular piece of property.

This 2006 proposal has some distinctions from the one last year. They include provisions for hiking/equestrian trails throughout the project, dedication of a school and park site, provision for 26% open space, protection of wildlife corridors and provision for a bird sanctuary on the land west of the railroad tracks.

This application should be evaluated based on its own merits, however, the observations in the 2005 report are not invalidated by the reduction of 500 or so units and provision for some of the amenities listed above. With that in mind, each evaluation criteria will be discussed again below.

Comparison of the proposed land use with the Plan's designated land use, according to the *Hierarchy of Land Use Designations From Least Intense to Most Intense*

The hierarchy referenced is shown as Table 4 in the Comprehensive Plan (see below). Simply put, this request is to change the Comprehensive Plan classification on the Montosa Ranch from Rural to Urban and, in terms of intensity, to move the land use designation from Ranch to Low-Density Residential (two levels up) on about 48 acres, Medium-Density Residential (three levels up) on about 321 acres and to High-Density Residential (four levels more intense) on 223 acres. The balance set-aside for a park, school and “quasi-public” site would remain Ranch.

<u>CLASSIFICATION</u>	<u>DESIGNATION</u>
RURAL	Public Lands/ State Trust
	Preservation
	Ranch 40
	Ranch
	Local Services
URBAN	Low-Density Residential
	Medium-Density Residential
	High-Density Residential
	Mixed Use
	Regional Services
	Enterprise

Under the current plan designation in the land use element of the Plan, the principal land uses and zoning districts permitted are shown in the graphic below.

Ranch - R	The principal land uses in this category are very low-density residential (¼ RAC or less), ranching, agriculture, viticulture, low intensity/low traffic tourism, resource conservation and accessory uses.	Zoning Districts permitted include GR-40 and GR. Other Zoning Districts may be permitted only as part of a PAD, provided the densities of the category are not exceeded within the PAD.
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As indicated, this is a designation that emphasizes low-density residential uses and traditional uses of the land such as ranching and various kinds of agriculture. Guidelines are for densities not-to-exceed one home per about four acres, which is consistent with the General Rural (GR) Zoning District. Development of smaller lots would be permitted as part of a Planned Area Development (PAD), but the number of total units would be capped at about 150 for the subject property plus whatever density bonus is allowed for the PAD.

Under the proposed designations in the land use element of the Plan, the principal land uses and zoning districts permitted are as follows:

Low Density Residential - LDR	The principal land uses in this category are residential (1 Residence Per Acre [RAC] or less) and low-intensity tourism services, restaurants, and neighborhood services.	Zoning Districts permitted are GR, SR, R-1 and B-1. Other Zoning Districts may be permitted only as part of a Planned Area Development (PAD), provided the densities of the category are not exceeded within the PAD.
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Medium Density Residential - MDR	The principal land uses in this category are residential (3 RAC or less) and retail, office and commercial services.	Zoning Districts permitted are R-1, R-2, R-3, B-1 and B-2. Other Zoning Districts may be permitted only as part of a PAD, provided the densities of the category are not exceeded within the PAD.
High Density Residential - HDR	The principal land uses in this category are single and multi-family residential (10 RAC or less), and retail, office and commercial services.	Zoning Districts permitted are R-4, R-5, MF, B-1 and B-2. Other Zoning Districts may be permitted only as part of a PAD, provided the densities of the category are not exceeded within the PAD.

These are primarily residential designations in the Plan with densities ranging from 1 RAC to 10 RAC. As indicated on the submittal, the applicant is asking for a total of 2,500 dwelling units varying in density from 1 RAC to 10 RAC.

The comparison, then, is that under the current designation, the subject property is in the Rural category and Ranch designation with an average density of 1 residence per 4 acres (1/4 RAC), while under the proposed designation the subject property would be in the Urban category and Low, Medium and High-Density designation. The developer is asking for an overall density of 4 RAC.

The comparison clearly shows that this Plan amendment would alter the current land use patterns envisioned for this area in the Plan.

Projected off-site impacts, including traffic, public safety and parks impacts and options available to mitigate such impacts

Off-site impacts of development are of concern to residents in the vicinity of the project and to local agencies tasked with managing such impacts and minimizing adverse effects on stretched resources. Such impacts can drive the need for 1) off-site access road widening and upgrading (including in this case, a new bridge across the Santa Cruz River), 2) ancillary facilities for emergency responders such as fire stations and sheriff's substations, 3) regional park amenities, 4) dedicated open space and wildlife habitat/corridors, 5) watercourse master planning and design, and 6) school sites etc.

This application and supporting documents contain additional information on off-site impacts. Some mitigation of development impacts is provided through provision of a park and school site (although the school site is not large enough according to the School Superintendent for that district) and open space/wildlife corridors. No provision for enhancing public safety resources was mentioned. Significantly more information has been provided on water, water systems and drainage considerations.

Questions to consider include: Could the off-site impacts be significant enough to alter the character of the area? Will the demands placed on existing resources by this development, such as law enforcement and fire fighters, adversely affect current levels of service absent a strong mitigation program by the applicant? Can the existing road system support this population at build-out with improvements only to Amado-Montosa Road? Can the additional right-of-way necessary to improve Amado-Montosa Road be acquired? How will this development impact adjacent properties, both developed and undeveloped? Will this development and the construction of a new bridge cause an acceleration of

development on adjacent private properties and State Trust Lands? What would be the long term impact of such acceleration?

Many of these questions arose during the 2005 amendment process and remain in play.

Impacts to the conservation, protection and sustainability of natural environment, including, but not limited to, hillsides, riparian areas, public lands, night sky, public lands access, surface and subsurface water and floodways

The applicant's narrative refers to conservation, environmental sensitivity and open space frequently. They are now committed to providing 26% open space.

A total of about 2,500 homes over 624 acres (about 4 RAC) will require alteration of the natural landscape. Referring to the last map in the core document (the lot layout plan), it is evident that the alteration will be significant.

Given the character of the Northwest Area and the goals identified in the Comprehensive Plan, will the impacts to the natural environment by the development be acceptable within the framework of the Plan or will those impacts be inconsistent with the Plan for this area? Will the open space set-aside proposed by the developer be enough to mitigate the effects this development might have on the natural environment? What are the natural resources on this property and what should be the conservation goals for it?

Pima County has commented on this proposed Comprehensive Plan amendment. Their views were solicited in compliance with Arizona Revised Statutes which require that adjacent counties be notified of major plan amendments. Their comment letter is attached. They have identified lands within their Conservation Lands System (CLS). East of I-19 just north of the county line in Pima County is a Biological Core in the CLS with a conservation threshold of 80%. This means that those areas should retain 80% of the biological resources in order to achieve the conservation goals for species that occupy that landscape. West of the Interstate is designated as Multiple Use in the CLS and carries a 75% conservation threshold. The letter also expresses concern for preserving the Santa Cruz River floodplains and the wildlife linkages, the latter of which the developer has acknowledged.

Identifying projected conflicts or consistencies with the goals of the appropriate character area within which it is located and whether any amendments to character area goals should be included in considering the proposed plan amendment

The five goals identified for the Northwest Character area are:

Goal 1: The historic, cultural, ranch and agricultural heritage of Santa Cruz County is preserved through land use patterns and development styles.

Potential Conflicts: This agricultural and ranch land will be converted to residential uses.

Potential Consistencies: Applicant has indicated they support architectural styles in keeping with early Arizona themes and those of the Spanish and Mexican periods.

Goal 2: Open space and natural terrain remain dominant features of the landscape and view sheds are protected.

Potential Conflicts: The densities proposed imply significant alteration of the natural terrain over the project site, which will impact view sheds.

Potential Consistencies: Twenty-six percent open space is proposed.

Goal 4: New development shall be designed to enhance the character of the surrounding area.

Potential Conflicts: This could adversely impact the I-19 scenic gateway (Policy 4.1.2) and is not consistent with Policy 4.1.3 which seeks to concentrate residential densities near existing communities and infrastructure.

Potential Consistencies: An all-weather river crossing is proposed which is part of the Comprehensive Plan.

Goal 8: The Santa Cruz River and its watershed are conserved and managed as a "living river" ecosystem.

Potential Conflicts: If not managed properly, development could impact the river channel causing sedimentation and, possibly, erosion.

Potential Consistencies: There is a better chance to control impacts to the river with a master planned area than with uncontrolled lot splits.

Goal 13: The County's natural and cultural resources contribute to tourism.

Potential Conflicts: There is no tourism element in the Plan amendment. This is all residential development and there will be resource damage as part of the development process.

Potential Consistencies: No land uses are proposed that are inconsistent with furthering tourism in the County.

The fundamental question comes down to this: Can the Land Use Designation Map be amended as requested here without invalidating other portions of the Comprehensive Plan as relates to the aspirations of the Northwest Character Area Element and other relevant elements? If it cannot, then the correct action is to either reject the amendment or accept it with the proviso that the other elements of the Plan will have to be revised as well to ensure compliance with the State mandate that rezoning must be consistent with County Comprehensive Plans.

The extent to which the proposed amendment accomplishes the goals and objectives of this Plan, as set forth in Appendix I

The applicant has referenced other sections of the Goals and Objectives of the Plan as evidence that this proposed project is consistent with the County Comprehensive Plan.

Please use the complete list of Goals, Objectives and Policies provided in the 2005 staff report enclosed if you wish to review and comment.

Community outreach efforts undertaken by the applicant

This evaluation criterion was placed in the Comprehensive Plan primarily in recognition of the enormous community effort that went into the development of the Plan. It was felt that the Character Area teams and all the others who participated week after week, meeting after meeting for two years deserved to be consulted when changes to the adopted Plan were being contemplated.

There are many avenues to accomplish community outreach throughout the County including chambers of commerce, homeowner's and property owner's associations, community foundations, citizen's groups, etc. Specifically in the Northwest Character Area, the Santa Cruz Valley Citizens Council routinely hears about land use plans in the area and often takes an official position. Additionally, the Chamber of Commerce has actively sponsored community discussions on the issues of the day.

A summary of community outreach efforts by the developer was requested but to date nothing has been received. The Santa Cruz Valley Citizens Council leadership reported that the developer's agent, representatives from The Molera-Alvarez Group, met with the Council's executive board once in late Spring of this year and it was decided that a presentation would be made to the entire community. A meeting date was set by all, but had to be cancelled a week before it was scheduled when The Molera-Alvarez Group declined to attend due to another commitment.

In addition, The Molera-Alvarez Group representatives met with the owner of the Rex Ranch on one occasion.

To date the County has not received any of the letters of support. We have, however, received numerous letters and e-mail messages in opposition to the Plan amendment requested. All are attached and any additional comments received will be available at the Commission hearing.

Any other element relevant to proper analysis of the proposed amendment

The County is going to continue to grow and planned development such as is proposed is inevitable. We cannot simply shut the doors. The question is where this development should be and at what cost. The costs for development can be measured in various ways. It can be the cost to the County for providing additional community services (American Farmland Trust documented that on average, residential uses required \$1.16 in services for every \$1 raised in tax revenues). It can be the cost of lost or compromised natural resources. It can be the cost the community perceives in a diminished quality of life caused by more traffic congestion and the visual sameness that often comes with urbanization.

There are also costs associated with blocking planned development from occurring. Unplanned “wildcat” development is happening all over Arizona and increasingly here in Santa Cruz County. It is only slowed by the limitations of the underlying zoning district’s minimum lot size, which in this case is 180,000 square feet. Also recall that there is some Light Industrial zoning on the property as well as the General Rural. The costs of such development is measured in the number of exempt wells depleting the aquifer, the proliferation of conventional septic systems potentially polluting the groundwater and miles of dirt roads generating dust.

In considering any amendment to the Comprehensive Plan, the Commission must weigh the costs of the change against the benefits accruing from the Plan as adopted. Conversely, there are benefits to be had for master planning of raw land that could outweigh the costs of adhering so closely to an adopted Plan that we inadvertently shoot ourselves in the foot.

We must all bear in mind that development is going to happen and it is our responsibility to ensure that it occurs where appropriate and in a manner that ultimately serves to further the community vision of the Comprehensive Plan:

Attachments

A – Application and Proposed Land Use Map

B – State Land Reform Initiative Information

Also attached:

Letter from Applicant

Comment Letters from Pima County, Town of Patagonia and School District

Written Comments from the Public

Copies of:

Bridge Study

Water Master Study

Jurisdictional Delineation Study

Core Document