

Tucson Mountains
ASSOCIATION
SINCE 1934

PO BOX 86117 • TUCSON, AZ 85754-6117

July 16, 2025

Pima County Planning and Zoning Commission
201 N. Stone Avenue
Tucson, AZ 85701

Re: Pima Prospers Comprehensive Plan Update – S-8 Tucson Mountains Special Area Policies

Dear Chair and Members of the Planning and Zoning Commission,

The Tucson Mountains Association (TMA), a 501(c)(4) organization founded in 1934, proudly represents thousands of residents in the Tucson Mountains and surrounding areas. For nearly a century, our mission has been to preserve open space, protect our unique Sonoran Desert ecology, and promote the well-being of residents in the area.

TMA has been deeply engaged in providing input on the S-8 Tucson Mountains section for the 2025 Pima Prospers Comprehensive Plan update. We have appreciated the opportunity to provide our expert and locally based perspective, however, we were concerned to see that important special area policies we proposed were removed from the 60-day Review Draft of S-8 Tucson Mountains, dated April 3, 2025.

Therefore, we respectfully request that the Commission reinstate the TMA-proposed special area policies in the S-8 Tucson Mountains section of the plan. These policies, which are detailed in the attached document, are the result of careful consideration and are designed to preserve the character and environmental integrity of our region for future generations.

We wish to clarify the nature and intent of these proposed policies. They are not zoning regulations or legal statutes that would affect existing private property rights or constitute a government taking of private property. Instead, they are intended as guiding principles for the next decade, providing an aspirational yet essential framework to ensure future development is harmonious with the unique habitats and residential communities of the Tucson Mountains. We believe the Pima Prospers plan should be a visionary document that recognizes and protects the special planning areas that make our county unique.

Thank you for your time and consideration. We have faith that you will restore these vital policies to the plan and help us continue our work of protecting this irreplaceable part of Pima County.

Sincerely,

Ed Hendel, President
Tucson Mountains Association

Attachment: TMA's Proposed Policies for S-8 Tucson Mountains

Name: S-8 Tucson Mountains (TM)

April 3, 2025 60-day Review Draft

Tucson Mountains Association (TMA) proposed special area policies July 2025

General Location: Within unincorporated portions of Township 13 South, Range 12 East; Township 13 South, Range 13 East; Township 14 South, Range 12 East; and Township 14 South, Range 13 East.

Description

The Tucson Mountains area was first homesteaded by families with the intention of keeping the area rural with large open residential parcels. Current residents expect the same. As a result, the Tucson Mountains contain some of the last significant open spaces to the west of Tucson's core. Low density development such as Suburban Ranch (SR = 1 Residential dwelling per 3.3 acres) help to retain the rural quality and dark skies of the area. To maintain their rural quality of life and property rights, current residents should have a reasonable expectation that the zoning (SR or CR-1) that existed in their community at the time they took up residence will be maintained in the foreseeable future. Current decisions for the use of this land will reverberate well into the future through its direct impact on the ecology, culture, and quality of life in our community.

The planning area is located between urbanizing areas in the City of Tucson and the public reserves of Tucson Mountain Park, Saguaro National Monument, and Sweetwater Preserve. This area is distinguished by rugged terrain, highly diverse vegetation, significant wildlife habitat, and many riparian areas as well as the scenic beauty and expansive view from Gates Pass and West Anklam Scenic Corridors. The purpose of the Tucson Mountains Special Area Policy is to protect this special environment while accommodating limited growth. To achieve this purpose, planning strategies include: 1) declining westward land use intensities; 2) A low-density conservation area and buffer to Tucson Mountain Park and Saguaro National Park; and 3) preserving in perpetuity habitat connectivity for biological conservation as emphasized in the Sonoran Desert Conservation Plan.

Policies

A. Structures

All structures west of Silverbell Road shall be limited to a maximum height of 24 feet and shall be sited and landscaped to minimize negative visual impacts. All structures shall be a color which is in context with the surrounding environment. Muted colors are acceptable for use on building exteriors and may include ranges of brown, such as rust, sepia, sands, tans, and buffs, and some olive and grey tones. Other tones and colors may be used for trim. Residences along W

Anklam and Gates Pass Roads must conform to the exterior colors in the Scenic Routes section of the Comprehensive Plan. Except for the Neighborhood Activity Center at the northwest corner of Sunset and Silverbell Roads, prevent new commercial structures west of Silverbell Road and north of Ironwood Hill Drive.

B. Open Space

[Reword the first long paragraph so the intent and purpose are clear, as requested by Gates Pass Area Neighborhood Association]

Preserve low density and open space in SR parcels, where adjacent to SR parcels on three sides, by only the Low Density Urban (LIU-0.3) land use designation.

C. Zoning Districts

1. Notwithstanding the zoning districts permitted under the Comprehensive Land Use Plan Legend, SH (Suburban Homestead Zone), RH (Rural Homestead Zone), and GR-1 (Rural Residential) shall not be permitted.
2. Notwithstanding the zoning districts permitted in accordance with the Major Resort Community provisions, CPI (Campus Park Industrial Zone) or TR (Transitional Zone) shall not be permitted.
3. Requests for commercial rezoning must be carefully analyzed for compatibility with the existing low-density residential character of the Tucson Mountains. Commercial development is not expected during the next 10 years or lifespan of the Pima Prospers 2025 Comprehensive Plan.
4. Ensure that duplex (2 dwellings) or triplex (3 dwellings) have the required acreage per dwelling for the existing residential zoning in the Tucson Mountains.

D. Floodplain Management

1. When addressing flood control and erosion, low impact design green infrastructure and building techniques shall be utilized to minimize the use of concrete and/or soil cement armoring and employ self-healing gabions as well as rock riprap wherever possible.
2. No Erosion Hazard Setback (EHS) variance shall be allowed to preserve the existing urban watercourse open space, habitats, and wildlife corridors in the Tucson Mountains.

E. Riparian Protection

1. All riparian areas shall be protected. In the Tucson Mountains these areas are primarily mapped as Xeroriparian Class C.

2. Development shall avoid the Flood Control Resource Areas, previously adopted in Pima Prospects Comprehensive Plan, to preserve habitat connectivity and wildlife corridors.

F. Buffer Overlay Zone

Continue to implement the Buffer Overlay Zone, including any additional properties added to Federal, State, or County Park boundaries.

G. Water Resources

Promote water harvesting in new residential construction to conserve potable water resources and to reduce stormwater runoff or flooding. The Pima County 2015 *Design Standards for Stormwater Detention and Retention Manual* and the City of Tucson 2005 *Water Harvesting Guidance Manual* provide techniques for residents to capture and collect stormwater runoff. Additionally, promote the installation of water-efficient appliances in new residential construction by contractors to further conserve water resources.

H. Dark Skies

Continue to implement and enforce the City of Tucson/Pima County **Outdoor Lighting Code to retain the dark skies in the Tucson Mountains.**

I. Climate Resiliency

Continue to promote and incentivize the installation of solar energy systems for residential dwellings units to facilitate providing hot water and electricity. In addition, all new construction is encouraged to incorporate proper solar orientation, passive cooling techniques (e.g. shade overhangs), and energy-efficient appliances and windows.

J. Accessory buildings (including Guest Houses)

Permitted coverage shall be a maximum of 3000 square feet to preserve the scale of buildings and open space in the Tucson Mountains.