August 12, 2006

Mr. Robert Damon, Chairman

Board of Supervisors
2150 North Congress Drive
Nogales, AZ 85621

Dear Mr. Damon,

The Friends of the Santa Cruz River (FOSCR) would like to take this opportunity to comment on the proposed change in zoning in Santa Cruz County, Arizona to Mr. Ross' Las Colinas de Tubac property. Our organization has a keen interest in this proposal because of its potential to adversely impact the Santa Cruz River.

FOSCR is a non-profit volunteer organization whose mission is to ensure the continued flow in the upper Santa Cruz River and to protect the stream's valuable ecosystem for current and future generations. The Santa Cruz River plays many vital roles for the community and the natural system including a source for groundwater recharge, improved water quality, reduction in peak flood flows and erosion, and sustained stream flow. Additionally, live streams and wetlands in general, and the Santa Cruz River in particular, support the highest biological diversity of any habitats in the Southwest. This is important not only for habitat to the many species of plants and animals found there, but also it is a key feature that residents of this county value and want to see protected.

Las Colinas de Tubac development is proposed by Mr. Ross. This proposed development is located near Tubac, Arizona in Township XX S., Range XX E., Section XX. It proposes to develop multi-family residential housing and commercial uses such as office or retail and an assisted living center on 32 acres. Currently the zoning in this area is Commercial (B-2).

The developer is requesting a variance to the current zoning in order to allow for mixed use. This would include 3.24 acres of B-2, 6.0 acres of multi-family residential, 2.8 acres of right-of-way, and 18.1 acres of open space. This would also change the classification of this land from rural to urban

The main concern that FOSCR has with this proposed development is its overall impact on the aquifer which supports the Santa Cruz River. Increased water use in this portion of the Santa Cruz watershed may further stress the river environment since groundwater pumped for this development would have otherwise reached the river aquifer.

Should this development take place, FOSCR recommends that the following water additional conservation measures be required:

- Require graywater systems in each home to reuse laundry and bath water.

- Detention/Retention basins should be sized correctly with a pervious bottom substrate to also promote recharge. The basins should be designed on appropriate soils information and based on realistic runoff coefficients for both existing and developed conditions.
- Require low flow fixtures and appliances in each home and business.
- Require the use of native, low water consuming plants.
- Offer incentives for the installation of rainwater harvesting systems.
- Limit residence lawn size.
- Use reclaimed or harvested water for watering plants along medians, roadways, and walkways.

In short, water consumption must be minimized to reduce groundwater depletion by the project design as a whole, especially consumption resulting from clustering and overall density increases. All opportunities to reduce habitat disturbance, road densities, water consumption, runoff and erosion, and to increase groundwater recharge must me maximized.

In all likelihood, the people who want to live and work in this development will be more than willing to help to preserve the beauty and habitat of the area; indeed, this is probably the major reason they are moving to the area in the first place.

Our organization would welcome the opportunity to work with the developer in order to help make this development more environmentally sensitive and to conserve our riverine resources.

Sincerely,

Sherry Sass
President, Friends of the Santa Cruz River

Cc: