



MEMORANDUM

DATE: December 4, 2019

TO: Entitlement Section

FROM: Scott Clark
Director, PDS

SUBJECT: Original City Zoning Translation of Pima County, South Kolb Specific Plan, Plan Amendment (Pima Co. Ordinance 2009-01, adopted January 6, 2009) to City of Tucson, Century Park Marketplace, PAD-26

Issue: This memo is to serve as clarification to the original city zoning translation of the Pima County South Kolb Specific Plan to PAD-26. Pima County disagreed with PDS translation of Planning Areas A and C permitted land uses. PDS met with Pima County and have resolved the translation as discussed below.

Background: Arizona State law provides that, in newly annexed areas, original City zoning may not allow uses or densities greater than those permitted under the County zoning. Consistent with State law and Mayor and Council policy, staff translates the County zoning to the most comparable City zoning, thereby allowing uses and densities equivalent to what was allowed under County zoning.

Planning Areas A, C, and D were annexed into the City of Tucson and established original city zoning for the Century Park Marketplace Annexation District (C15-14-01) in 2014. Planning Area B (and adjacent non-Specific Plan area lands) were annexed into the City of Tucson and established original city zoning for the Kolb-Valencia Annexation District (C15-18-07) in 2019. Both of these annexations translated the land use regulations of the South Kolb Specific Plan (original and amendments) as approved by the Pima County Board of Supervisors to City of Tucson PAD-26.

The South Kolb Road Specific Plan (Co23-8-01) was approved in November 1988 (Pima County Ordinance 1988-182). The plan covered approximately 350 acres on the east side of Kolb Road and permitted uses were mainly commercial and industrial development, which were divided into smaller Planning Areas (A through H). An amendment to the specific plan (Co23-08-11), which added about 83 acres to the original South Kolb Road Specific Plan area, was approved in January 2009 (Pima County Ordinance 2009-1) – this included 16 acres to Planning Area A, 0.5 acres to Planning Area C, and a new 67.6 acres Planning Area I.

The original South Kolb Specific Plan restricted hotel/motel and public assembly facilities in Planning Areas A, B, and C. The amendment to the specific plan (Co23-08-11) as approved in January 2009 permitted uses allowed in CI-1 (light industry and warehousing) and commercial uses allowed in CB-1 and CB-2, with no stated prohibition of hotels for the added amendment areas. Hotels are still

restricted in the original Specific Plan, Planning Areas A, B and C, but are permitted in the 2009 amendment areas for Planning Areas A and C.

The 2009 amendment did not use a standard protocol of strikeouts and underlines, rather a separate specific plan document was added onto the original Kolb Road Specific Plan. The amendment lumped the amendment acreage with the original acreage for Planning Areas A and C. This caused confusion because PDS staff did not understand that only the additional acreage is subject to the 2009 amendment. Due to the lack of understanding on how the amendment was to be implemented, the translation that PDS staff originally made was that Planning Areas A and C replace the language in the original Specific Plan. The Pima County intent was explained in a joint meeting, and this memo is to clarify the original translation, and to affirm the Pima County zoning to the most comparable City zoning.

Conclusion: Hotel use was prohibited in the entire area of Planning Areas A and C as established by the original specific plan. In the limited sub-areas amended in 2009 – the eastern edge of Planning Area A, and a small corner of Planning Area C – the 2009 amendment authorizes hotel use.

Attachments/Enclosures


Pima County Memorandum dated October 11, 2019



MEMORANDUM

Date: October 11, 2019

To: Carmine DeBonis, Jr.
Deputy County Administrator
for Public Works

From: C.H. Huckelberry
County Administrator 

Re: **Inquiry regarding Hotel Development near Valencia and Kolb Area**

I understand there have been inquiries and concerns expressed by Davis-Monthan AFB regarding the development of hotels at the intersection of Kolb and Valencia, specifically in PAD-26, or the South Kolb Specific Plan prior to it being annexed by the City of Tucson. The development areas in question involve Planning Areas A, B and C in PAD-26.

When approved by the Board in 1988, the South Kolb Specific Plan prohibited hotel/motel uses in Planning Areas A, B and C (see Attachment 1, map 1). A subsequent amendment in 2008, added additional acreage to Planning Areas A and C, as well as a new Planning area (see Attachment 1, map 2). The amendment established zoning uses on this additional acreage without stating outright a hotel/motel use prohibition. Clearly, the additional acreage is subject to the amendment, however, it does not impact the current prohibition of hotel use on the balance of Planning Areas A and C as established by the specific plan. Hotel uses continue to be a prohibited use in Planning Area B.

Please inform City of Tucson Planning of the ordinance governing land use of these properties when annexed.

Attachment

CHH/dr

c: Dr. Yves Khawam, Assistant County Administrator for Public Works
Diana Durazo, Special Projects Manager to the County Administrator



MEMORANDUM

Date: October 11, 2019

To: C.H. Huckelberry
County Administrator

From: Diana Durazo, 
Special Projects Manager

Re: **Permitting of hotels / motels in South Kolb Road Specific Plan Areas at Kolb & Valencia Intersection**

We have received inquiries regarding the development of hotels in an area to the east of the intersection of S. Kolb Road and E. Valencia Road, rezoned in the County as the South Kolb Specific Plan in 1988. It was later annexed by the City of Tucson as PAD 26. Below is information Mark Holden, with County Planning, provided regarding the County specific plan and subsequent amendment approved in 2008 for additional acreage.

As provided by County Planning

The area was rezoned under a Specific Plan (also referred to as a Planned Area Development in other jurisdictions) when located within unincorporated Pima County. The South Kolb Road Specific Plan (Co23-88-01) was approved in November 1988 (Pima County Ordinance 1988-182). The plan area covered approximately 350 acres on the east side of Kolb Road and permitted uses were mainly commercial and industrial development, which were divided into smaller Planning Areas (A through H). An amendment to the specific plan (Co23-08-01), which added about 83 acres to the original South Kolb Road Specific Plan area, was approved in January 2009 (Pima County Ordinance 2009-1) – this included about 16 acres to Planning Area A, ½ acre to Planning Area C, and a new 67.6-acre Planning Area I. (Attachment 1 - Ordinance maps for both Specific Plans)

Specifically, South Kolb Road Specific Plan Planning Areas A, B and C, which consisted of approximately 100 acres in area to the east of the Kolb and Valencia intersection, have been discussed for the permitting of hotels. Planning Areas A, C and D were annexed into the City of Tucson in 2014; Planning Area B (and adjacent non-Specific Plan area lands) were annexed in 2018. The annexations adopted the land use regulations of the South Kolb Road Specific Plans (original and amendment) as they were approved by the Pima County Board of Supervisors, as City of Tucson Planned Area Development (PAD) 26.

Regarding hotels, the original South Kolb Road Specific Plan states that hotel/motel and public assembly facilities are restricted in Planning Areas A, B and C. The Specific Plan Amendment

C.H. Huckelberry, County Administrator

Re: **Permitting of hotels / motels in South Kolb Road Specific Plan Areas at Kolb & Valencia Intersection**

October 11, 2019

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permits uses allowed in CI-1 (light industry and warehousing) and commercial uses allowed in CB-1 and CB-2 zones, with no stated prohibition of hotels for the added amendment area. Hotels would still be restricted from original Specific Plan Planning Areas A, B and C, but would be permitted in the Amendment Areas only for Planning Areas A and C. This is based on the following facts:

- the South Kolb Road Specific Plan Amendment (Co23-08-01) is a separate specific plan document, which added acreage to the original specific plan area and did not amend the original specific plan;
- the South Kolb Road Specific Plan Amendment Ordinance (2009-1, Attachment 2) references and maps the added 83.4 acres of amended area that is subject to the Amendment – no change was made to the original specific plan area; and
- the amendment plan maps display Amendment Areas as additions to the Planning Areas - the plan does not state that amended land use designations and development standards shall replace or apply to the original Planning Areas approved under Ordinance 1988-182.

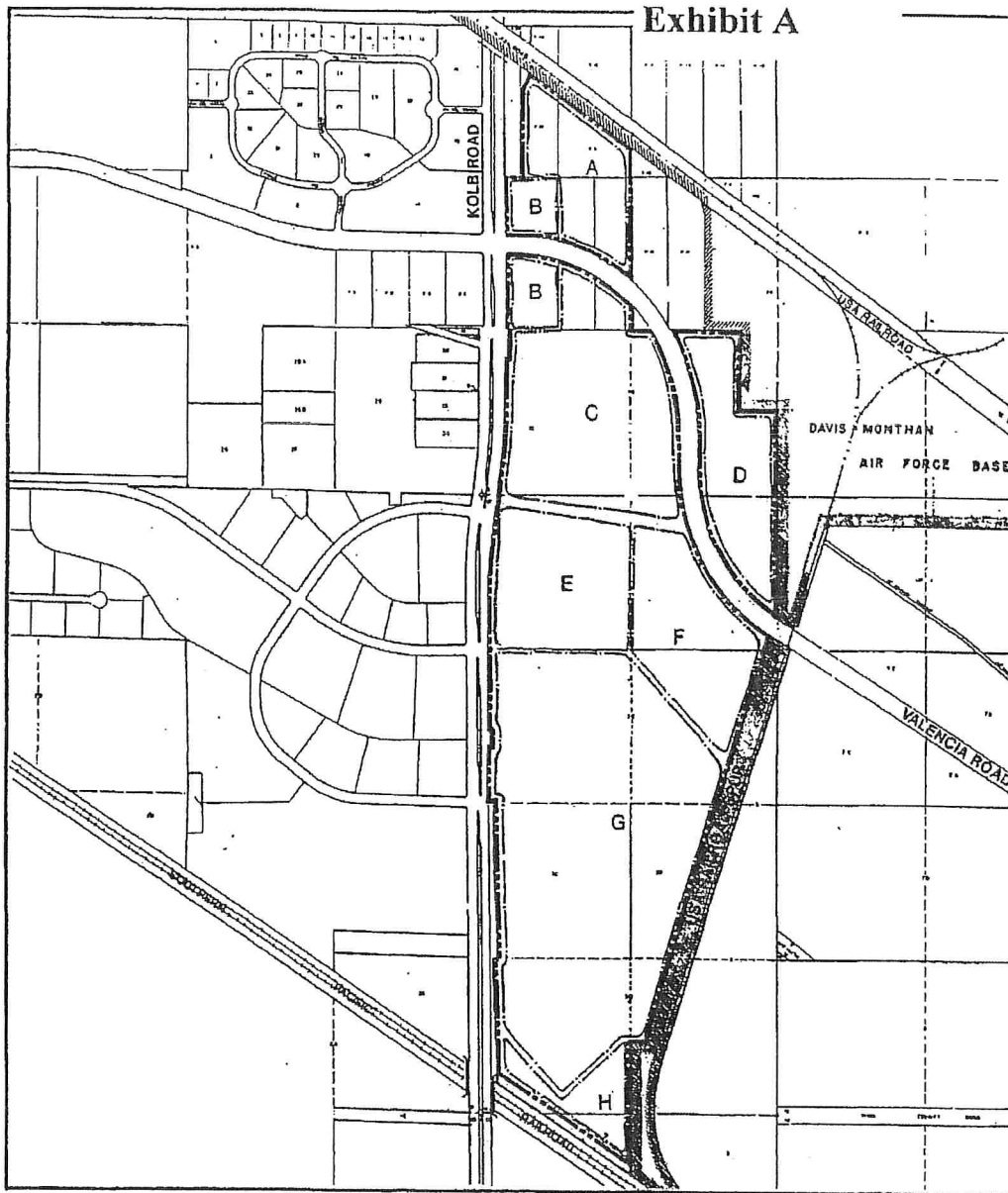
Additionally, the amendment ordinance also states (Condition #8) that in the event of conflict between the requirements of the specific plan amendment and other regulations (e.g., the original specific plan), the more restrictive requirement shall apply. This would uphold the original restriction of hotel/motel and public assembly facilities from the original specific plan.

DD/dr

Attachments

ATTACHMENT 1

Co23-88-01 S Kolb Road Specific Plan - approved November 1988



SCALE IN FEET
0 400 800 1200

J Jerry R. Jones & Associates, Inc.
ENGINEERS, PLANNERS AND SURVEYORS
2515 W. 10TH ST. - TUCSON, AZ 85742

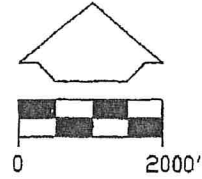
**PLANNING
AREAS**

**SOUTH KOLB RD
SPECIFIC PLAN**

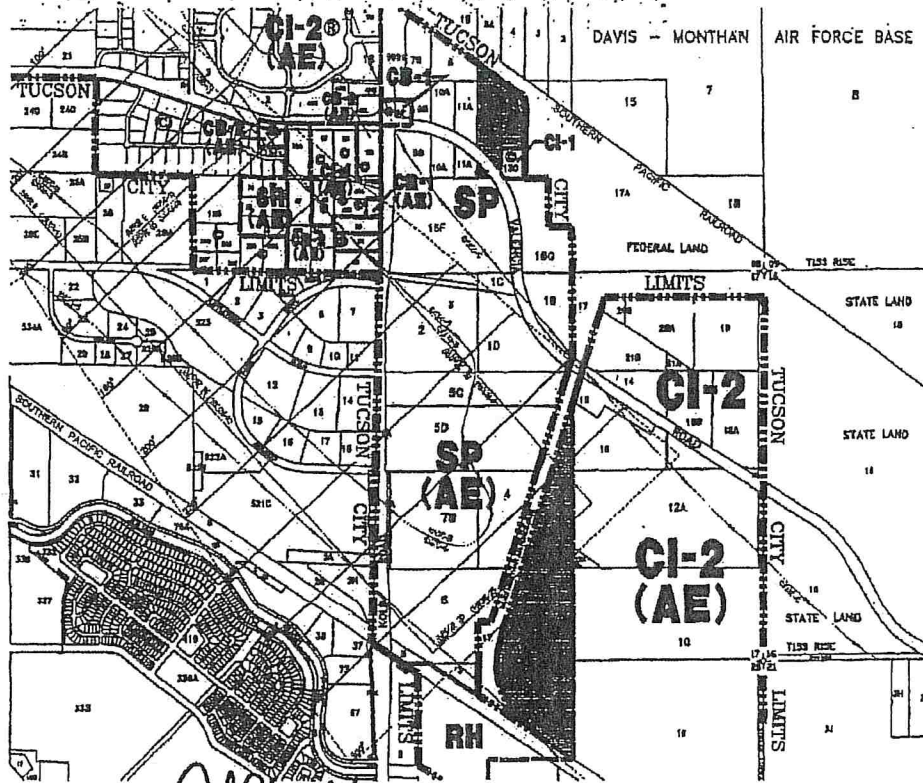
Co23-08-01 S Kolb Road Specific Plan Amendment - approved January 2009

EXHIBIT A

AMENDMENT NO's. 21 & 23 BY ORDINANCE NO. 2009-1
 TO PIMA COUNTY ZONING MAP NO's. 31,58 TUCSON, ARIZONA.
 PARCEL 5B BEING A PART OF THE SE 1/4 NW 1/4 OF SEC
 08, T15S, R15E; PARCELS 12B, 12C, 13C & 13B BEING A PART
 OF THE NE 1/4 SW 1/4 OF SEC 08, T15S, R15E; PARCEL 9
 BEING A PART OF THE SE 1/4 NW 1/4 AND E 1/2 SW 1/4 OF
 SEC.17, T15S, R15E; AND PARCEL 2 BEING A PART OF THE
 NE 1/4 NW 1/4 OF SEC 20, T15S, R15E.



ADOPTED JANUARY 6, 2009 EFFECTIVE FEBRUARY 6, 2009



Carl Shickel

EXECUTIVE SECRETARY PIMA COUNTY PLANNING AND ZONING COMMISSION

© NO BUILDING PERMITS WITHOUT CERTIFICATE OF COMPLIANCE
 FROM SR 55.1 ac±, CI-1 6.2 ac±, RH 22.1 AC±
 PJ-DECEMBER 02, 2008

Co23-08-1
 Co7-00-20
 Co23-88-1
 MULTIPLE TAX
 PARCEL CODES

1-23-09

ATTACHMENT 2

SOUTH KOLB ROAD SPECIFIC PLAN AMENDMENT

Co23-08-01



THE PLANNING CENTER
a division of TPC Group, Inc
110 s church ste 6320 tucson az 85701

South Kolb Road Specific Plan Amendment

East of Kolb Road, North and South of Valencia Road
Pima County, Arizona

Submitted to:

**Pima County
Development Services Department**
201 North Stone Avenue, Second Floor
Tucson, Arizona 85701

Prepared for:

Lucky Levin Railroad, LLC and Valencia Kolb Properties, LLC
6964 East Century Park Drive
Tucson, Arizona 85706
Telephone: (520) 623-1411

Prepared by:

The Planning Center
110 South Church Avenue, Suite 6320
Tucson, Arizona 85701
Telephone: (520) 623-6146

With assistance from:

Bill Baker and Associates
3561 East Sunrise Drive, Suite 225
Tucson, Arizona 85718
Telephone: (520) 318-1950

And:

PSOMAS
800 East Wetmore Road, Suite 110
Tucson, Arizona 85719
Telephone: (520) 292-2300



Board of Supervisors Approved Submittal
November 2008

F. ANN RODRIGUEZ, RECORDER
RECORDED BY: LAM
DEPUTY RECORDER
6545 AS2

P0230
PIMA CO CLERK OF THE BOARD
PICKUP



DOCKET: 13478
PAGE: 2800
NO. OF PAGES: 10
SEQUENCE: 20090130631
01/21/2009
ORDIN 18:00
PICKUP
AMOUNT PAID \$ 0.00

ORDINANCE 2009- 1

AN ORDINANCE OF THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA; RELATING TO ZONING; REZONING PROPERTY (PARCEL CODES 141-06-005B, 141-06-012B, 141-06-012C, 141-06-013B, 141-06-013C, 141-07-0090, 141-10-0020) FROM RH (AE) (RURAL HOMESTEAD) (AIRPORT ENVIRONS AND FACILITIES), SR (AE) (SUBURBAN RANCH) (AIRPORT ENVIRONS AND FACILITIES), AND CI-1 (LIGHT INDUSTRIAL/WAREHOUSING ZONE) TO SP (AE) (SPECIFIC PLANS, SOUTH KOLB ROAD SPECIFIC PLAN (FIRST AMENDMENT)) (CO23-08-01) (AIRPORT ENVIRONS AND FACILITIES) LOCATED EAST OF SOUTH KOLB ROAD AND ON THE NORTH AND SOUTH SIDES OF WEST VALENCIA ROAD; AMENDING PIMA COUNTY ZONING MAP NOS. 31 AND 58.

BE IT ORDAINED BY THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA:

Section 1. The 83.4 acres, located east of South Kolb Road and on the north and south sides of West Valencia Road, illustrated by the shaded area on the attached rezoning ordinance map (Exhibit "A"), which amends Pima County Zoning Map Nos. 31 and 58 is hereby rezoned from RH (AE) (RURAL HOMESTEAD) (AIRPORT ENVIRONS AND FACILITIES), SR (AE) (SUBURBAN RANCH) (AIRPORT ENVIRONS AND FACILITIES), AND CI-1 (LIGHT INDUSTRIAL/WAREHOUSING ZONE) TO SP (AE) (SPECIFIC PLANS) (AIRPORT ENVIRONS AND FACILITIES).

Section 2. Rezoning Conditions.

1. Not more than 60 days after the Board of Supervisors approves the Specific Plan, the owner(s) / developer(s) shall submit to the Planning Director the specific plan document, including any necessary revisions of the specific plan document reflecting the final

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actions of the Board of Supervisors, and the specific plan text and exhibits in an electronic format acceptable to the Planning Division.

2. Submittal of a development plan, or acceptable site development plan, if determined necessary by the appropriate County agencies.
3. Recording of a covenant holding Pima County harmless in the event of flooding.
4. Recording of the necessary development related covenants as determined appropriate by the various County agencies.
5. Provision of development related assurances as required by the appropriate agencies.
6. Prior to the preparation of the development related covenants and any required dedication, a title report (current to within 60 days) evidencing ownership of the property shall be submitted to the Development Services Department, Document Services.
7. There shall be no subdividing or lot splitting without the written approval of the Board of Supervisors.
8. In the event of a conflict between two or more requirements in this specific plan, or conflicts between the requirements of this specific plan and another Pima County regulation not listed in Section 18.90.050B3, the more restrictive requirement shall apply.
9. This specific plan shall adhere to all applicable Pima County regulations that are not explicitly addressed within this specific plan. The specific plan's design guidelines shall be interpreted to implement the specific plan or relevant Pima County regulations.
10. Prior to the issuance of any permits, this specific plan amendment site is subject to the approval of the Subdivision Review Committee.

A. Subdivision Block Plat: The subdivision block plats shall reference all dedications (including roads, sewer, drainage, trails and open space), unless otherwise specified in a development agreement, and the plats shall identify all necessary improvements. Upon submittal of the block plats, the studies, reports, information required by these specific plan conditions and the specific plan document itself, shall be provided for review and approval of the applicable Pima County department or departments. Subsequent site development requires submittal of development plans/site development plans prepared in accordance with the subdivision block plats.

B. Development Plans/Site Development Plans: The plans shall identify all necessary improvements. Upon submittal of the development plans, the studies, reports, information required by these specific plan conditions and the specific plan document

itself, shall be provided for review and approval of the applicable Pima County department or departments. Subsequent site development shall require amendment of the applicable development plan/site development plan.

11. No building permits shall be issued until all applicable specific plan requirements for or affecting the site are satisfied and the Planning Director issues a Certificate of Rezoning Compliance.
12. Regional Flood Control District requirements:
 - A. Drainage shall not be altered, disturbed or obstructed without the written approval of the Flood Control District.
 - B. The property owner(s) shall obtain a Floodplain Use Permit for any development on the subject property.
 - C. A drainage study shall be submitted for review and approval, which addresses the impacts of development to the federally mapped floodplain and local area drainage.
 - D. The property owner(s) shall provide necessary on-site and off-site drainage improvements as required by the Flood Control District.
 - E. All-weather access shall be provided to all lots to meet concurrency requirements.
 - F. A riparian mitigation plan shall be required for development in designated riparian areas.
 - G. The annual improvements implementation and maintenance report, is to be submitted to PCRFCDD. This report shall include information pertaining to the status of floodplain changes and improvements, riparian mitigation and maintenance.
13. Wastewater Reclamation Department requirements:
 - A. The owner / developer shall construe no action by Pima County as a commitment to provide sewer service to any new development within the rezoning area until Pima County executes an agreement with the owner / developer to that effect.
 - B. The owner / developer shall obtain written documentation from the PCRWRD that treatment and conveyance capacity is available for any new development within the rezoning area, no more than 90 days before submitting any tentative plat, development plan, sewer improvement plan or request for building permit for review. Should treatment and / or conveyance capacity not be available at that time, the owner / developer shall have the option of funding, designing and constructing the necessary

REZONE CONCEPT

improvements to Pima County's public sewerage system at his or her sole expense or cooperatively with other affected parties. All such improvements shall be designed and constructed as directed by the PCRWRD.

C. The owner / developer must secure approval from the Pima County Department of Environmental Quality to use on-site sewage disposal systems within the rezoning area allowing on-site sewage disposal systems at the time a tentative plat, development plan or request for building permit is submitted for review.

D. The owner / developer shall time all new development within the rezoning area to coincide with the availability of treatment and conveyance capacity in the downstream public sewerage system.

E. The owner / developer shall fund, design and construct all off-site and on-site sewers necessary to serve the rezoning area, in the manner specified at the time of review of the tentative plat, development plan, sewer construction plan or request for building permit.

F. The owner / developer shall design and construct the off-site and on-site sewers to accommodate flow-through from any properties adjacent and up-gradient to the rezoning area that do not have adequate access to Pima County's public sewer system, in the manner specified at the time of review of the tentative plat, development plan, sewer construction plan or request for building permit.

G. The owner / developer shall also design and construct any necessary off-site sewers to accommodate the anticipated wastewater flow from any properties down-gradient from the rezoning area that can reasonably be served by those sewers, in the manner specified at the time of review of the tentative plat, development plan, sewer construction plan or request for building permit.

H. The owner / developer shall complete the construction of all necessary public and/or private sewerage facilities as required by all applicable agreements with Pima County, and all applicable regulations, including the Clean Water Act and those promulgated by ADEQ, before treatment and conveyance capacity in the downstream public sewerage system will be permanently committed for any new development within the rezoning area.

I. The owner / developer shall connect all development within the rezoning area to Pima County's public sewer system at the location and in the manner specified by the PCRWRD in its capacity response letter and as specified by the Development Services Department at the time of review of the tentative plat, development plan, sewer construction plan, or request for building permit.

14. Department of Environmental Quality requirement: If on-site wastewater disposal is

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proposed, and public sewer is within 200 feet of the property line, a request for waiver of connection to public sewer requirements shall be made and must be approved prior to the issuance of the Construction Authorization Certificate.

15. Cultural Resources requirements:

A. As documented in the cultural resources survey reports submitted by Westland Resources, Inc., proposed development in the Amendment area of 83.4 acres will have no impact on any known cultural resources; therefore, no mitigative actions are necessary. There are known cultural resources, however, located within the area defined in the existing South Kolb Road Specific Plan. Therefore, a cultural resources mitigation plan for any identified archaeological and historic sites on the subject property shall be submitted to Pima County at the time of, or prior to, the submittal of any tentative plan or development plan. Following rezoning approval, any subsequent development requiring a Type II grading permit will be reviewed for compliance with Pima County's cultural resources requirements under Chapter 18.81 of the Pima County Zoning Code.

B. In the event that cultural resources are revealed during ground-disturbing activities, all construction shall cease, and consultation shall be initiated with ASM to assess the potential significance of any unearthed materials (ARS §41-841). If human skeletal remains or funerary objects are discovered, ASM will be contacted immediately (ARS §41-865 & §41-844).

16. In the event the subject property is annexed, the owner(s) / developer(s) shall adhere to all applicable rezoning conditions, including, but not limited to, development conditions which require financial contributions to, or construction of infrastructure, including without limitation, transportation, flood control, or sewer facilities.

17. The property owner shall execute and record the following disclaimer regarding Prop 207 rights. "Property Owner acknowledges that neither the rezoning of the Property nor the conditions of rezoning give Property Owner any rights, claims or causes of action under the Private Property Rights Protection Act (Arizona Revised Statutes Title 12, chapter 8, article 2.1). To the extent that the rezoning or conditions of rezoning may be construed to give Property Owner any rights or claims under the Private Property Rights Protection Act, Property Owner hereby waives any and all such rights and/or claims pursuant to A.R.S. § 12-1134(I)."

18. Adherence to the specific plan document as approved at the Board of Supervisor's public hearing.

19. Compliance with the Joint Land Use Study (JLUS) use restrictions and development standards as stated in the Pima County Comprehensive Plan Special Area Policies S-24, S-26, S-27 (*Policies and Land Use Intensity Legend*). For the purposes of this condition, "compatible uses" mean permitted uses. In the case of conflicting regulations, the most restrictive shall apply. Compliance with Ch. 18.57 is also required.
20. Upon the effective date of the Ordinance, the owner(s)/developer(s) shall have a continuing responsibility to remove buffelgrass (*Pennisetum ciliare*) from the property. Acceptable methods of removal include chemical treatment, physical removal, or other known effective means of removal. This obligation also transfers to any future owners of property within the rezoning site and Pima County may enforce this rezoning condition against the current and any future property owner. Prior to issuance of the certificate of compliance, the owner(s)/developer(s) shall record a covenant, to run with the land, memorializing the terms of this condition.
21. Prior to the issuance of a certificate of occupancy for any structure taller than the maximum height allowed by the zoning code for the equivalent zone, the developer shall provide written certification to the Planning Director that the development has an active contract with an emergency services provider capable of providing adequate fire services for the subject structure.

Section 3. That Pima County Zoning Maps 31 and 58 of Sections 8 and 17 of T15S, R15E, are hereby amended to the SP (AE) (Specific Plan) (Airport Environs and Facilities) Zone as shown on the entitled "Amendment No. ___ by Ordinance No. ___ to Pima County Zoning Maps 31 and 58 contained in Exhibit A to this ordinance and incorporated herein by this reference.

Section 4. That the South Kolb Specific Plan Amendment, attached as Exhibit B (which has not been recorded but may be viewed at the office of the Pima County Development Services Department - Planning Division), is hereby adopted, subject to amendment by the specific plan applicant of Exhibit B, as necessitated by the Board of Supervisors' action.

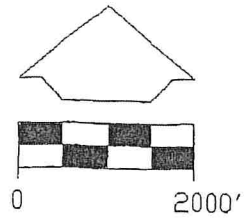
Section 5. That the Legal Description of the South Kolb Road Specific Plan Amendment is hereby shown in Exhibit C to this ordinance and incorporated herein by this reference.

Section 6. No building permits shall be issued based on the rezoning approved by this Ordinance until all conditions 1 through 21 are satisfied and the Planning Official issues a Certificate of Compliance.

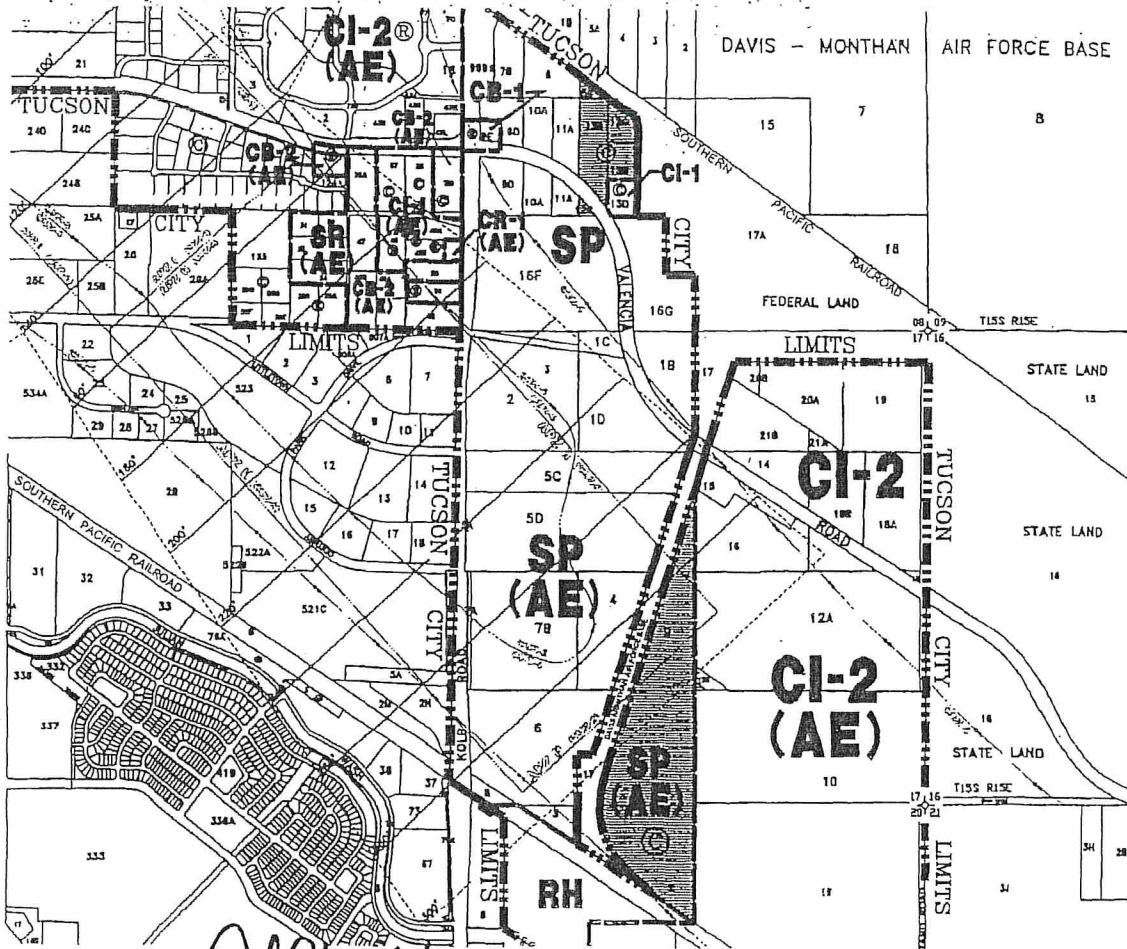
Section 7. The rezoning conditions of Section 2 may be amended or waived by resolution of the Board of Supervisors in accordance with Chapter 18.90 of the Pima County Zoning Code.

EXHIBIT A

AMENDMENT NO's. 21 & 23 BY ORDINANCE NO. 2009-1
 TO PIMA COUNTY ZONING MAP NO's. 31,58 TUCSON, ARIZONA.
 PARCEL 5B BEING A PART OF THE SE 1/4 NW 1/4 OF SEC 08, T15S, R15E;
 PARCELS 12B, 12C, 13C & 13B BEING A PART OF THE NE 1/4 SW 1/4 OF SEC 08, T15S, R15E;
 PARCEL 9 BEING A PART OF THE SE 1/4 NW 1/4 AND E 1/2 SW 1/4 OF SEC.17, T15S, R15E;
 AND PARCEL 2 BEING A PART OF THE NE 1/4 NW 1/4 OF SEC 20, T15S, R15E.



ADOPTED JANUARY 6, 2009 EFFECTIVE FEBRUARY 6, 2009



Carl Skellern

EXECUTIVE SECRETARY PIMA COUNTY PLANNING AND ZONING COMMISSION

PIMA COUNTY

© NO BUILDING PERMITS WITHOUT CERTIFICATE OF COMPLIANCE
 FROM SR 55.1 ac±, CI-1 6.2 ac±, RH 22.1 AC±
 PJ-DECEMBER 02, 2008

Co23-08-1
 Co7-00-20
 Co23-88-1
 MULTIPLE TAX
 PARCEL CODES

Exhibit B is the South Kolb Road Specific Plan Amendment document approved by the Pima County Board of Supervisors on November 18, 2008.

The document is not recorded but may be viewed at the office of the Pima County Development Services Department, Planning Division, at the following address:

County-City Public Works Building
201 N. Stone Avenue, 2nd Floor
Tucson, Arizona

Exhibit C -- Legal Description

SOUTH KOLB ROAD SPECIFIC PLAN AMENDMENT LEGAL DESCRIPTION

NORTH BLOCK

A portion of the Southwest Quarter of Section 8, Township 15 South, Range 15 East of the Gila and Salt River Meridian, Pima County, Arizona.

The above described parcel of land contains 15.8 acres, more or less.

SOUTH BLOCK

A portion of the West Half of Section 17, Township 15 South, Range 15 East of the Gila and Salt River Meridian, Pima County, Arizona.

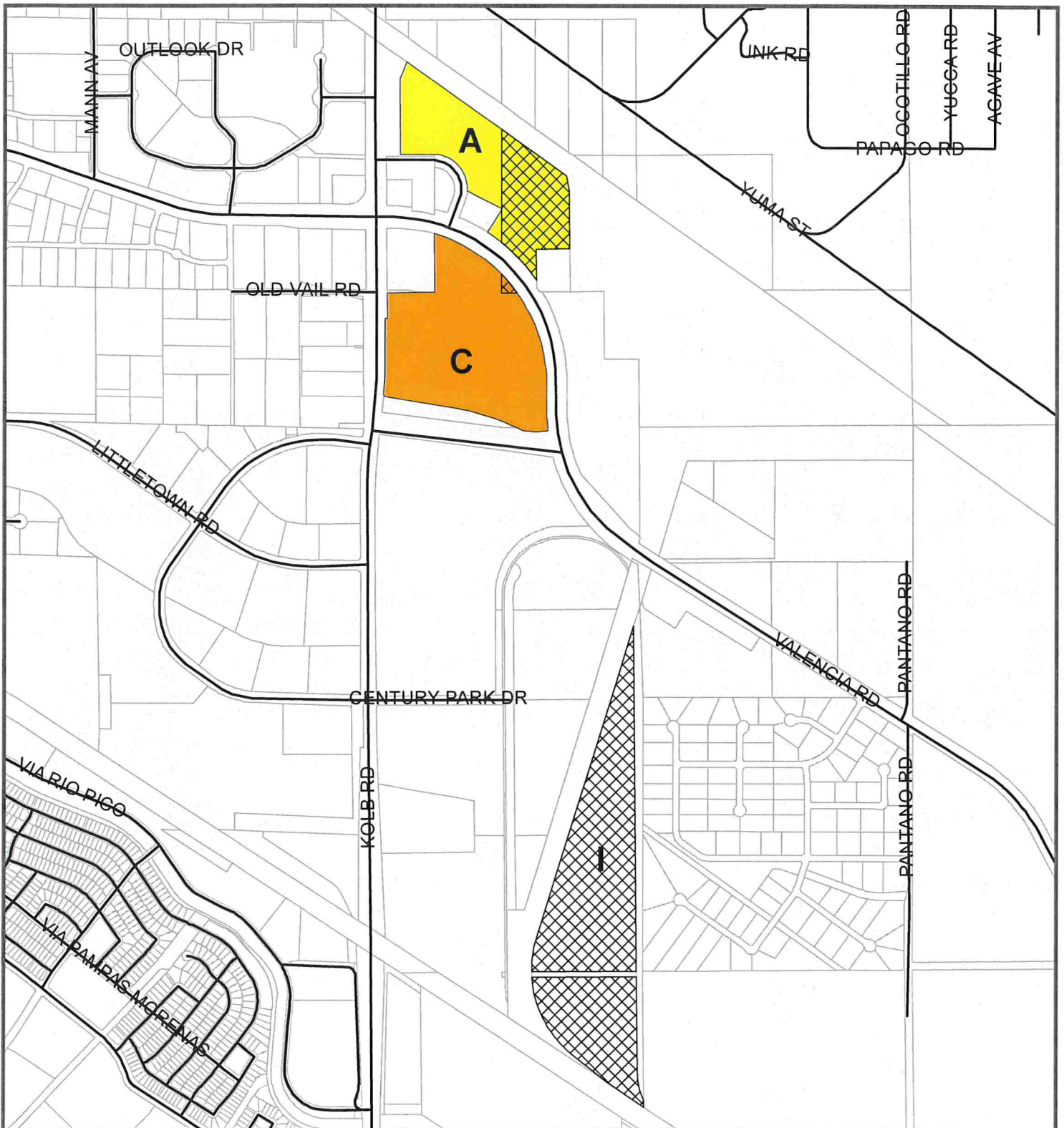
The above described parcel of land contains 45.5 acres, more or less.

A portion of the Northwest Quarter of Section 20, Township 15 South, Range 15 East of the Gila and Salt River Meridian, Pima County, Arizona.

The above described parcel of land contains 22.1 acres, more or less.

South Kolb Road Specific Plan Amendment - CO23-08-01

Approved Nov. 18th, 2008; Adopted Jan. 6, 2009



 Amendment Areas

Planning Areas:

A= 24.5ac	Amended Area- 15.3ac
C= 59.5ac	Amended Area- 0.5ac
I =	Amended Area- 41.3ac



Address: S. Kolb Rd. and E. Valencia Rd.
Ward: 4

 Feet
0 670 1,340

1 inch = 1,333.333333 feet

