



United States Department of the Interior  
NATIONAL PARK SERVICE  
Saguaro National Park  
3693 South Old Spanish Trail  
Tucson, Arizona 85730



IN REPLY REFER TO:

February 28, 2019

Development Services Department  
Planning Division  
Attn: Nick Coussoulis  
201 North Stone, Second Floor  
Tucson, Arizona 85701

Mr. Coussoulis:

Thank you for the opportunity to review the submitted Type II Conditional Use Permit for a minor resort by El Cortijo LLC on South Old Spanish Trail. We understand that the proposal for a Bike Ranch (minor resort) is an allowable use under the underlying Suburban Ranch Zoning subject to a Conditional Use Permit.

Our main concern for any development adjacent to park boundaries is compliance with current zoning to include the additional protections offered under the Buffer Overlay Zone (BOZO). We believe the zoning that is in place provides protections for wildlife corridors and habitats, as well as reduced lighting, noise and visual impacts. These regulations also help to preserve wilderness characters within the park that many of our visitors seek. From a resource perspective, the most significant aspect of the property is Escalante wash. It is an important biological link that reaches from the protected habitats of Saguaro National Park into the adjacent low density neighborhoods. The current proposal does not include developing the portion of the property that includes Escalante wash, and accommodates habitat connectivity in two other minor washes in the development zone, keeping current development inward facing and outside of natural washes.

We have appreciated the efforts of the current land owners and MJM Consulting, LLC to include us in discussions regarding their development plan. Working with a single entity on the interconnectivity of undisturbed native vegetation, both upland and riparian to maintain biological connectivity as well as placement of driveways, structures, and utilities has provided us with a greater confidence in their ability to comply with and potentially exceed some of the regulations of the BOZO.

The developer has made significant changes to the development plan since 2014, most notably, complying with all current zoning regulations. The current plan, addresses park concerns of reducing visual impacts by providing for the required setbacks and buffer zones, not exceeding heights of 34 feet and using building colors that blend with the natural environment, maintaining the required 30% natural open space and striving for an additional 20% functional open space, low level lighting so as to not interfere with night sky viewing or impair the movement of nocturnal animals, screening parking lots and utilizing plants from the approved plant list. The developer is trying to achieve Platinum level LEED certification, which is certainly a standard we would support.

El Cortijo LLC's concept of a Bike Ranch falls in line with many National Park Service strategic initiatives including Green Parks Plan, Climate Friendly Parks Program, A Call to Action, Urban Agenda and Healthy Parks Healthy People. These strategies are all about building partnerships beyond park boundaries and promoting alternative transportation as a way to experience the park. Biking in Saguaro National Park has long been part of the culture at the Rincon Mountain District, and bicycle safety is of utmost importance to us. Working with the Bike Ranch, neighbors, Pima County and local biking groups to collaborate on ways to incorporate additional bicycle use safely and in a way that fits with Saguaro's current infrastructure will continue to be an important aspect of discussions we would be interested in joining as this concept moves forward.

Understandably there is a concern regarding the additional traffic that the Bike Ranch could generate on Old Spanish Trail near the entrance of the park. The current concept plan leans towards limiting traffic using shuttles and bicycles as the primary mode of transportation. Our understanding, based on the most recent traffic study, is the current carrying capacity on Old Spanish Trail will easily accommodate the estimated increases in traffic for the Bike Ranch concept. This sustainable increase in traffic also supports the requirement that a majority of the services offered at the minor resort are limited to guest use and public facing activities, which include bike rentals and a café, compliment the applicant's intent of this being a performance, training and fitness center for national and international bicyclists.

We look forward to continuing to work with current land owners as a neighbor and partner moving forward. Should you have any questions, please feel free to contact me at [leah\\_mcginnis@nps.gov](mailto:leah_mcginnis@nps.gov) or 520-733-5101.

Sincerely,



Leah McGinnis  
Superintendent, Saguaro National Park