SKYLINE
NEIGHBORHOOD
REVIEW COMMITTEE
— Preserving the Character of Our Community —

September 1, 2026

Terrill L. Tillman, AICP
Principal Planner
Pima County Development Services
201 N. Stone Avenue, 1st Floor
Tucson, AZ 85701

RE: Rezoning Application P26SP00002 – Formal Hillside Development Overlay Zone (HDZ) Compliance Objection and Request for County Determination

Dear Ms. Tillman and Members of the Pima County Planning and Zoning Commission:

As Chair of the **Skyline Neighborhood Review Committee**, I am writing on behalf of our Committee, which is comprised of concerned homeowners residing within Skyline Country Club Estates, to formally object to Rezoning Application P26SP00002 submitted by The Club at Skyline, LLC at 5200 East Saint Andrews Drive.

This letter specifically addresses the proposed development's compliance with **Pima County Code Chapter 18.61, Hillside Development Overlay Zone ("HDZ")**.

Our Committee is also submitting separate comments concerning the project's compliance with **Chapter 18.67, Buffer Overlay Zone**. Although Chapters 18.61 and 18.67 establish separate regulatory requirements, the two issues intersect in an important respect: both require careful County review of the applicant's proposal to place substantial residential development along the eastern hillside and ravine, which the applicant itself identifies as the primary area of undisturbed natural land within the redevelopment area.

The Skyline Neighborhood Review Committee is not an HOA governing board and does not purport to speak on behalf of SCCEIA. Rather, we are a group of homeowners who have undertaken a detailed review of the Specific Plan because of its potential impacts upon our community and the questions it raises regarding compliance with applicable Pima County requirements.

Background

The Specific Plan proposes a row of multi-story townhomes along the eastern edge of the existing parking area and immediately adjacent to the natural hillside and ravine.

The Specific Plan states:

- “The proposed Upper Terrace townhomes will have a maximum height of approximately 26 feet on the upslope side of each home and 36 feet on the downslope side” (p. 48).
- The townhomes along the eastern edge of the parking lot will appear as two-story residences from the parking area and three-story residences from the eastern façade because of the site's natural slope (p. 47).
- “Where feasible, foundations or portions of structures may be supported on elevated or pier-based systems to preserve native vegetation and reduce grading impacts” (p. 47).
- The Plan depicts changes to natural grade, including areas of substantial fill and retaining improvements along the ravine edge.

These characteristics warrant particularly careful review under Chapter 18.61. The stated purposes of the HDZ include conserving hillside resources, matching development intensity to natural terrain, minimizing grading, minimizing disturbance to existing drainage patterns and erosion, and providing safe access to hillside development.

We therefore request a formal County determination addressing the following issues before the rezoning application advances.

1. Average Cross-Slope Calculations and Treatment of the Eastern Natural Hillside

The Specific Plan states:

“Because the vast majority of the site consists of previously graded and disturbed hillside conditions, the limited retained natural areas are not representative of its overall slope characteristics and therefore have not been used to recalculate the site's average cross slope” (p. 52).

At the same time, the applicant acknowledges on page 47 that:

“this eastern slope represents the primary area of undisturbed natural land within the redevelopment area.”

This distinction is important.

Pima County Code §18.61.051 permits the average cross slope (“ACS”) for residential development to be recalculated after establishment of a natural area, with that natural area excluded from both the contour-length and project-area components of the calculation.

Accordingly, we do not ask the County to assume that exclusion of natural area from ACS calculations is inherently improper. Instead, we request that the County determine and document:

1. What acreage has been included in the original ACS calculation;
2. What acreage, if any, has subsequently been excluded as HDZ natural area;

3. The ACS both **before and after** exclusion of any natural area;
4. Whether the eastern hillside and ravine are included or excluded from either calculation;
5. Whether every area excluded from the ACS calculation will be formally established, surveyed, recorded and permanently protected as HDZ natural area;
6. Whether any proposed building footprint, pier, retaining wall, grading, utility improvement, drainage improvement or other development encroaches into land excluded from the ACS calculation; and
7. How the resulting ACS affects the permissible residential density under §18.61.052.

These calculations should be clearly shown in the public record before the County makes its rezoning recommendation.

2. Slope Density and the Proposed 17-Unit Development

Chapter 18.61 ties residential development intensity to average cross slope.

The applicant should therefore demonstrate—not merely assert—that the proposed density of up to 17 residential units is consistent with the applicable slope-density requirements after proper calculation of the project's ACS and any legally established HDZ natural area.

We request that County staff independently verify the applicant's calculations and identify in the staff report the applicable ACS, resulting slope-density standard, any exception or exemption being relied upon, and the resulting maximum permissible residential density.

3. Previously Developed Areas Do Not Eliminate the Need to Analyze New Hillside Disturbance

The Specific Plan relies heavily on the fact that portions of the Club property were developed decades ago.

However, the current application proposes **new development**, including residential structures, excavation, grading, retaining improvements and potentially pier-supported foundations along the eastern natural hillside.

The relevant question should therefore not simply be whether portions of the overall Club property were previously disturbed. The County should determine whether the **new disturbance now being proposed** complies with the current HDZ standards applicable to the project.

Likewise, the existence of older development elsewhere within Skyline should not substitute for demonstrating compliance of this new development with current HDZ requirements.

4. Grading, Retaining Walls and Pier-Supported Construction Require Detailed Review

The applicant proposes three-story downslope elevations along steep natural terrain and expressly reserves the possibility of elevated or pier-supported foundation systems.

Rather than assuming such construction necessarily violates the HDZ, we request that the County require sufficient engineering documentation to determine its compliance.

Specifically, the County should require cross-sections and engineering information showing:

- Existing and proposed natural grades;
- Finished-floor elevations;
- Maximum cut and fill depths;
- Retaining-wall heights;
- Combined exposed slopes;
- Pier or elevated-foundation locations and depths;
- Limits of grading and disturbance;
- Building heights as measured under applicable County requirements;
- Slope-stabilization methods; and
- Revegetation and restoration measures.

5. Building Height Should Be Formally Verified

The Specific Plan itself describes approximately 26-foot heights on the upslope side and approximately 36-foot heights on the downslope side.

Given the proposed stepped construction and possible elevated or pier-supported foundations, we request that County staff expressly determine how building height is measured for each proposed structure and whether every structure complies with all applicable height limitations.

This determination should be supported by site-specific cross-sections rather than generalized architectural illustrations.

6. Drainage, Erosion and Ravine Integrity

Protection of existing drainage patterns and reduction of erosion are among the important purposes of the Hillside Development Overlay Zone.

The eastern hillside and ravine are therefore not merely aesthetic features. They are components of the site's natural topography and drainage system.

The proposed excavation, fill, retaining walls, foundations and other improvements could alter the manner in which stormwater enters, crosses or leaves this terrain.

Before rezoning approval, we request a detailed drainage and erosion analysis demonstrating that the project will not:

- Concentrate or redirect runoff toward neighboring properties;
- Increase erosion within the ravine;

- Destabilize natural or constructed slopes;
- Adversely alter existing drainage patterns; or
- Require future corrective improvements affecting neighboring property.

This issue should also be coordinated with the project's Buffer Overlay review because Chapter 18.67 separately addresses natural open space, vegetation, wildlife movement and qualifying sensitive washes. These drainage and ravine concerns are also specifically identified in the original draft.

7. Relationship Between HDZ Natural Area and Buffer Overlay Natural Open Space

This issue warrants particular attention.

The applicant acknowledges that the eastern slope is the primary remaining undisturbed natural land within the redevelopment area. Yet this is also the area toward which the proposed Upper Terrace residential development extends.

The applicant's treatment of this land under the HDZ should therefore be reconciled with its treatment under the Buffer Overlay Zone.

If land is excluded from the ACS calculation because it is being established as protected HDZ natural area, the County should determine whether the proposed development actually preserves that land.

Conversely, if portions of this eastern hillside are proposed for residential structures, foundations, grading or retaining improvements, the County should explain how those same areas are being treated for purposes of HDZ natural-area calculations and Buffer Overlay natural-open-space calculations.

The two overlay analyses should use a **consistent and transparent description of what land will actually remain undisturbed and permanently protected**.

8. Relationship to the Separate Buffer Overlay Zone Objection

The **Skyline Neighborhood Review Committee** is separately submitting a formal objection and request for County determination regarding Chapter 18.67, Buffer Overlay Zone.

Although Buffer Overlay compliance is legally distinct from HDZ compliance, the two analyses raise the same fundamental land-planning question:

Why should the project's selected density and configuration extend substantial residential development toward the principal remaining natural hillside and ravine rather than reduce the number or footprint of residences, increase setbacks, or relocate development toward previously disturbed portions of the property?

We respectfully request that County staff evaluate the HDZ and Buffer Overlay issues together when determining whether the proposed density, location and configuration are appropriate for this environmentally sensitive hillside property.

Requested County Action

The Skyline Neighborhood Review Committee respectfully requests that Pima County:

1. Independently verify the project's ACS calculation.
2. Identify the ACS before and after exclusion of any HDZ natural area.
3. Identify precisely what land is being excluded and require that qualifying natural area be surveyed, recorded and permanently protected as required by Chapter 18.61.
4. Determine whether any proposed structures, foundations, grading, retaining walls, utilities or drainage improvements encroach into land excluded as HDZ natural area.
5. Identify the applicable slope-density requirement and demonstrate whether the proposed 17-unit density complies.
6. Require detailed cross-sections showing existing and proposed grades, building heights, cuts, fills, retaining walls, piers and limits of disturbance.
7. Require appropriate geotechnical, slope-stability, drainage and erosion analysis for development along the eastern hillside and ravine.
8. Reconcile the project's HDZ natural-area treatment with its Buffer Overlay natural-open-space calculations.
9. Identify any HDZ exception, modification or other relief requested by the applicant and the legal and factual basis for such relief.
10. Withhold a favorable recommendation on the Specific Plan until these HDZ compliance questions have been resolved and documented in the public record.

Conclusion

The Skyline Neighborhood Review Committee is not asking Pima County to presume that development on hillside property is prohibited. We are asking the County to apply the protections Chapter 18.61 was specifically adopted to provide.

The proposed project places substantial multi-story residential development immediately adjacent to the principal remaining natural hillside and ravine, involving grading, retaining improvements and potentially elevated or pier-supported foundations.

Before this property is rezoned to permit that development, the County should establish—with transparent calculations, independent County review and appropriate engineering evidence—that the proposed density, grading, natural-area treatment, drainage and hillside disturbance comply with the Hillside Development Overlay Zone.

For these reasons, the **Skyline Neighborhood Review Committee respectfully requests that Pima County Development Services recommend denial or deferral of Rezoning Application P26SP00002 unless and until the applicant demonstrates compliance with all applicable requirements of Chapter 18.61.**

Please incorporate this letter in its entirety into the official staff report and public record for Rezoning Application P26SP00002 and provide the Skyline Neighborhood Review Committee notice of future public hearings, staff reports and material HDZ determinations concerning this application.

Respectfully submitted,

Edward J. Sullivan
Chair
Skyline Neighborhood Review Committee
Skyline Country Club Estates
Tucson, Arizona 85718