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MEMORANDUM

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2014 MAY 23 PM 12 25

TO: Docket Control Center

FROM: Steven M. Olea
Director
Utilities Division

ORIGINAL

DATE: May 23, 2014

RE: STAFF REPORT IN THE MATTER OF THE APPLICATION OF PRESIDIO TRAILS DEVELOPMENT, LLC AND HALCYON ACRES ANNEX NO. 2 WATER CO., INC. FOR DELETION OF PRESIDIO TRAILS DEVELOPMENT, LLC'S PROJECT FROM HALCYON ACRES ANNEX NO. 2 WATER CO., INC.'S CERTIFICATE OF CONVENIENCE AND NECESSITY (DOCKET NO. W-02312A-13-0326)

Attached is the Staff Report for Halcyon Acres Annex No. 2 Water Co., Inc. ("Halcyon") application for deletion of Presidio Trails Development, LLC's ("Presidio") project area from Halcyon's Certificate of Convenience and Necessity. Staff recommends denial of the application.

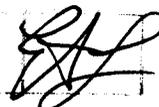
SMO:RGG:tdp\BES

Originator: Robert G. Gray

Arizona Corporation Commission

DOCKETED

MAY 23 2014

DOCKETED BY 

Service List for: HALCYON ACRES ANNEX NO. 2 WATER CO., INC.
Docket No. W-02312A-13-0326

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**STAFF REPORT
UTILITIES DIVISION
ARIZONA CORPORATION COMMISSION**

HALCYON ACRES ANNEX NO. 2 WATER COMPANY, INC.

DOCKET NO. W-02312A-13-0326

**APPLICATION FOR DELETION OF PRESIDIO TRAILS DEVELOPMENT, LLC'S
PROJECT FROM HALCYON ACRES ANNEX NO. 2 WATER CO., INC.'S
CERTIFICATE OF CONVENIENCE AND NECESSITY**

MAY 23, 2014

STAFF ACKNOWLEDGMENT

The Staff Report for Halcyon Acres Annex No. 2 Water Company, Inc., Docket No. W-02312A-13-0326, was the responsibility of the Staff members listed below. Robert G. Gray was responsible for the review and analyses of the Company's application. Katrin Stukov was responsible for the engineering and technical analysis. Tom Davis was responsible for reviewing the Commission's records on the Company, determining compliance with Commission policies/rules and reviewing customer complaints filed with the Commission.



Robert G. Gray
Executive Consultant III



Katrin Stukov
Utilities Engineer



Tom Davis
Consumer Analyst I

EXECUTIVE SUMMARY
HALCYON ACRES ANNEX NO. 2 WATER COMPANY, INC.
DOCKET NO. W-02312A-13-0326

Halcyon Acres Annex No. 2 Water Company, Inc. (“Halcyon”) is a public service corporation providing water service to approximately 36 customers in the Tucson area in Pima County. Halcyon has requested Commission approval of the deletion of a portion of its service territory where Presidio Trails Development, LLC (“Presidio”) seeks to build an apartment complex. Staff has reviewed this application and recommends that the Commission deny the application, as Halcyon may be able to provide service to the apartment complex through the purchasing of water from the City, but has not pursued that possibility to date.

Staff recommends that the Company be required to file with Docket Control, as a compliance item in this docket within 90 days of the effective date of this Decision, documentation from Arizona Department of Water Resources indicating that the water system is compliant with departmental requirements governing water providers and/or community water systems.

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INTRODUCTION

On September 20, 2013, Presidio Trails Development, LLC (“Presidio”) filed an application with the Commission requesting deletion of a portion of Halcyon Acres Annex No. 2 Water Co., Inc.’s (“Halcyon”) service territory contained in the Certificate of Convenience and Necessity (“CC&N”) held by Halcyon. The area to be deleted contains land owned by Presidio. Presidio plans to build an apartment complex on this 11 acre piece of land that would have 208 units. Halcyon had sought approval from the City of Tucson (“City”) to make certain zoning alterations to its well site in order to have sufficient facilities to serve the additional customers it would serve if Presidio’s apartment complex were built. Halcyon’s efforts at the City were successful until the Tucson City Council (“City Council” or “Council”) voted to deny Halcyon’s application, following a City Council session where a number of area residents expressed opposition to the apartment complex and by association Halcyon’s requested zoning alterations. Presidio has expressed a belief that Halcyon is unable to serve the proposed apartment complex due to the City Council’s rejection of Halcyon’s application, a representation Halcyon disputes.

On October 10, 2013, Staff filed a response, indicating that Presidio’s filing should be treated as a complaint, and encouraging Halcyon and Presidio to avail themselves of the Commission’s informal complaint process in an effort to resolve their differences. On October 15, 2013, Presidio made a filing, disputing aspects of Staff’s October 10, 2013 filing, but agreeing to have its filing treated as a complaint and agreeing to work with Halcyon to resolve their differences via the informal complaint process. Presidio further requested that its filing be stayed while the informal complaint process was undertaken. On October 24, 2013, Halcyon made a filing indicating that it did not object to Presidio’s proposal for the filing to be stayed and indicating that Halcyon and Presidio had already scheduled a meeting to attempt to resolve their differences. On October 29, 2013, the Administrative Law Judge (“ALJ”) issued a procedural order, staying the proceeding while the informal complaint process was pursued.

On January 27, 2014, Presidio and Halcyon filed a status update, indicating that they had reached an agreement to resolve their differences. The filing indicates that Halcyon and Presidio reached an agreement in early December 2013, which was finalized on December 23, 2013. The filing further moved for the joinder of Halcyon as a co-applicant. The parties further requested that the application be processed as a request of a utility, Halcyon, for the deletion of a portion of its service area, representing Presidio’s land, under Halcyon’s CC&N.

On February 11, 2014, the ALJ issued a procedural order lifting the stay on the proceeding and recognizing the application by Halcyon as a utility requesting the deletion of a portion of its CC&N. On March 12, 2014, Halcyon filed a clarification of Halcyon’s joinder in Presidio’s application for deletion, clarifying which aspects of Presidio’s September 20, 2013 filing Halcyon joins. On March 13, 2014, Halcyon made a filing amending the legal description that was attached to the September 20, 2013 filing by Presidio.

On March 13, 2014, Staff issued a sufficiency letter indicating that Halcyon's application was found sufficient for Staff to begin its substantive review. On March 26, 2014, the ALJ issued a procedural order, setting a procedural conference for April 10, 2014. On April 15, 2014, the ALJ issued a procedural order, setting this matter for a hearing on June 12, 2014, as well as setting various other dates. On May 9, 2014, two individuals, (Charles) Jonathan Kent and John Moritz, each filed to intervene in this matter.

The primary condition of the agreement between Halcyon and Presidio is that Presidio will pay \$100,000 to Halcyon upon successful deletion of Presidio's property from Halcyon's CC&N and that Halcyon and Presidio agree to work together to pursue Commission approval of the deletion of Presidio's property from Halcyon's CC&N. Attachment 2 to this report is a Staff memo containing maps showing the area proposed for deletion as well as the amended legal description.

Halcyon's most recent general rate proceeding was in Docket No. W-02312A-06-0211, resulting in Commission Decision No. 68921 (August 29, 2006).

CUSTOMER USAGE

Halcyon's existing 36 customers had a monthly average usage in 2013 of 15,213 gallons based on Halcyon's 2013 annual report. The highest monthly average usage was in June at 21,750 gallons and the lowest monthly average usage was in February at 9,861 gallons. Halcyon estimates that if it served Presidio the typical customer in the apartment complex would use an average of 200 gallons per day.

OPTIONS FOR SERVING PRESIDIO

Given the City Council's rejection of Halcyon's request for zoning alterations to its storage tank site with no direction from the Council as to how Halcyon could amend its application, it seems to be problematic for Halcyon to find a way to proceed with its initial configuration for the storage site to enable it to provide service to Presidio.

The option supported by Halcyon and Presidio is for Presidio's property to be deleted from Halcyon's CC&N and then Presidio would be served by Tucson Water, as requested by the applicant in this proceeding. Halcyon's service territory would shrink and it would lose the opportunity to greatly expand its customer base, but it would receive a payment of \$100,000 and there would be no change in its rates to its existing customers. Future Presidio customers would pay more if they took service from Tucson Water, given Tucson Water's rates are higher than Halcyon's.

In response to a Staff data request, Halcyon did indicate that it believed that it could reduce the storage tank height by excavating the location, thus having a portion of the tank below grade or that the tank height could be reduced by flattening the tank. Halcyon believes that this could help Halcyon better comply with the height/setback ratio requirements of the City Code. However, in response to another Staff data request, Halcyon indicated that alternative engineering configurations would also require the approval of the City and thus would very possibly face the same denial as the

original configuration. It is not known at this time what the cost would be and if there would be other difficulties with such an approach.

Halcyon has further indicated that it has not had discussions with the City regarding a possible purchase of Halcyon and that Halcyon is not interested in such a scenario.

Another option, as noted in the attached Staff Engineering Memorandum (Attachment A) is for Halcyon to pursue additional interconnection(s) with Tucson Water to meet its additional service needs to serve Presidio. Halcyon already has an emergency interconnect with Tucson Water and it is possible that Halcyon could expand its reliance on Tucson Water to meet its potentially larger service needs. Indeed, in 2013, Halcyon relied on purchases from Tucson Water for 28 percent of its water supplies (1,999,000 gallons were purchased from Tucson Water, while 5,161,000 gallons were pumped). This reliance on Tucson Water peaked in May 2013 when Halcyon pumped only 30,000 gallons while purchasing 494,000 gallons from Tucson Water. The existing interconnection with Tucson Water, a 2 inch pipe, is insufficient to reliably serve the additional demand Presidio represents. Halcyon has indicated to Staff in data requests that it is unknown whether Tucson Water could meet Halcyon's additional needs to possibly serve Presidio, what the cost of this option is, or what the rate impact of such an approach would be for Halcyon's current customers or prospective Presidio customers. In response to a Staff data request, Halcyon indicated that it does not wish to utilize Tucson Water.

COMMISSION INTEREST IN HAVING LARGER WATER COMPANIES AND CONSOLIDATION

There are over 400 individual water systems operated by nearly 350 different companies under the ACC's jurisdiction. The Commission has long had a concern with the number of small water companies it regulates and the issues that face such small water companies. As the October 28, 1999, Interim Report of the Arizona Corporation Commission's Water Task Force noted on page 4:

"Many of Arizona's water companies are quite small; the majority of them have less than \$250,000 in annual revenues. Although some small water companies are well run and provide quality service to their customers, many of these small companies are quite problematic. Most of the "problem" companies that the Commission must deal with are quite small. Because of their small base of customers, even quality managers of small companies may find it difficult to raise sufficient revenues to make needed capital investments."

Further, on the Commission's website under the Frequently Asked Questions section of its water/sewer page, the question "Why are there so many water and sewer companies?" is posed. The answer, in part, states that:

"Because there are certain fixed costs of running a water system, (for example: billing costs, maintenance, payroll, electricity and water quality testing) there is a move toward consolidation. This helps spread these expenses over a larger number of customers -

particularly the rising costs of water testing and treatment - and consolidation can sometimes mean lower rates for consumers. Of course, much of this depends on the age of the systems, the costs of linking two or more companies together and other considerations. Consolidation or expansion of existing systems is generally preferred where practical.”

The Commission’s interest in this regard is also reflected in its adoption in 2010 of much stricter rules governing the creation of new CC&Ns and extension of existing CC&Ns for water and sewer service.

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY (“ADEQ”) COMPLIANCE

ADEQ has reported that the Company’s water system is currently delivering water that meets water quality standards required by 40 C.F.R. 14 (National Primary Drinking Water Regulations) and Arizona Administrative Code, Title 18, Chapter 4.¹

ARIZONA DEPARTMENT OF WATER RESOURCES (“ADWR”) COMPLIANCE

The water system is located in the Tucson Active Management Area. According to an ADWR compliance status report, dated February 10, 2014, ADWR has determined that the Company’s water system is not in compliance with ADWR requirements, as the Company failed to file the System Water Plan and Annual Service Area Distribution Maps.

ARIZONA CORPORATION COMMISSION (“ACC”) COMPLIANCE AND COMPLAINTS

On October 2, 2013, the Utilities Division Compliance Section indicated that the Company has no delinquent ACC compliance items. According to information from the ACC’s Corporations Division, Halcyon’s corporate status in is Good Standing. According to the ACC’s Consumer Services database, Halcyon had no complaints in 2011, 2012, and 2014, and one complaint in 2013. All complaints have been resolved and closed.

CURTAILMENT TARIFF

The Company has an approved Curtailment Tariff.

BACKFLOW PREVENTION TARIFF

The Company has an approved Backflow Prevention Tariff.

¹ Per ADEQ Compliance Status Reports dated October 13, 2013.

STAFF CONCLUSIONS AND RECOMMENDATIONS

Given Halcyon's very small size, with only 36 customers, Staff believes that the Commission interest in making small water companies more viable in the long term is an important consideration in determining how to treat Halcyon's application in this proceeding. While Halcyon has indicated to Staff that it does not believe it will have significant infrastructure upgrades and replacements in the near term future, eventually all water companies incur some level of capital expenses to maintain quality service to their customers. If Halcyon can retain the Presidio development within its CC&N, it would potentially increase its customer base from 36 to approximately 244. If this occurred, it would provide a much bigger customer base over which to spread any future costs.

Staff recognizes that Halcyon has undertaken significant, if unsuccessful, efforts to move forward with serving Presidio through its attempts to get City approval of the necessary zoning alterations for its storage site. Staff is also cognizant that Halcyon stands to receive a payment of \$100,000 which could be used to benefit existing and future Halcyon ratepayers. However, there is a potential option for serving Presidio which Halcyon has not evaluated and which could enable Halcyon to retain Presidio's proposed apartment complex within its service territory. Specifically, Halcyon should evaluate the possibility of taking water service from Tucson Water to meet additional needs resulting from Presidio's development. If this option is shown to not be viable, Staff would reconsider its opposition to approval of the application.

At this time, Staff recommends that the Commission reject Halcyon's application based upon the fact that Halcyon has a possible option for serving Presidio. Retention of the Presidio development within its service area, if possible, is in Halcyon's long term best interests.

Staff recommends that the Company be required to file with Docket Control, as a compliance item in this docket within 90 days of the effective date of this Decision, documentation from ADWR indicating that the water system is compliant with departmental requirements governing water providers and/or community water systems.

M E M O R A N D U M

TO: Robert Gray
Executive Consultant III
Utilities Division

FROM: Katrin Stukov *KS*
Utilities Engineer
Utilities Division

DATE: March 11, 2014

RE: Application of Halcyon Acres Annex No. 2 Water Company for deletion of a portion of its Certificate of Convenience and Necessity (Docket No.W-02312A-13-0326).

Introduction

On September 20, 2013, Presidio Trails Development, LLC (“Presidio”) filed with the Arizona Corporation Commission (“Commission”) an application for approval of deletion of the Presidio’s parcel (“Parcel”) from the service area of the Certificate of Convenience and Necessity (“CC&N”) held by Halcyon Acres Annex No. 2 Water Company (“Halcyon” or “Company”). According to the procedural order dated February 7, 2014, this matter is being considered as a request by Halcyon for deletion of a portion of its CC&N.

Halcyon provides service to approximately 36 customers in an area of Pima County, east of City of Tucson. The Company’s CC&N area is within the City of Tucson city limits and covers approximately 106 acres. The Parcel covers approximately 11 acres and is located in the eastern portion of the Company’s service area. Presidio intends to develop a 208 unit apartment complex project known as The Place at Presidio Trails (“Project”).

Water System

Based on the Halcyon’s plant description, obtained from the Company’s 2012 Annual Report, the current water system consists of one well, one pressure tank and a distribution system. The water system has no storage tank. According to the Company, Halcyon has an emergency interconnection¹ with the City of Tucson water system (“Tucson Water”) and supplements its domestic water supply via the interconnect, as needed. Fire flow is provided by Tucson Water’s existing pipelines and fire hydrants located throughout the Company’s service area².

Based on the water use data, obtained from the Company’s 2013 Annual Report, Staff concludes that the Company system’s source production capacity (combined with the use of the Tucson Water emergency interconnect) is adequate to serve the current Halcyon customer base and reasonable growth, but lacks independent storage capacity to serve the future Project. As an

¹ 2-inch metered interconnection with 150 gallons per minute capacity (per Company responses KS 1.1)

² Per Company response KS 1.3

alternative to independent storage capacity, a second interconnection with Tucson Water could satisfy the storage capacity deficiency.

A copy of the line extension agreement (“LEA”) between Halcyon and the Project developer (submitted with the Application as Exhibit J)³ included a Water System Analysis, prepared by Westland Resources, Inc., which outlined water demand projections and proposed water facility improvements (including a 150,000 gallons storage tank, a booster station and a second 2-inch metered interconnection with Tucson Water) necessary to provide adequate water service for the remaining undeveloped property within the Company’s service area, including the future Project. According to the Company, none of these water facility improvements have been constructed.

Arizona Department of Environmental Quality (“ADEQ”) Compliance

ADEQ has reported that the Company’s water system is currently delivering water that meets water quality standards required by 40 C.F.R. 14 (National Primary Drinking Water Regulations) and Arizona Administrative Code, Title 18, Chapter 4.⁴

Arizona Department of Water Resources (“ADWR”) Compliance

The water system is located in the Tucson Active Management Area. According to an ADWR compliance status report dated February 10, 2014, ADWR has determined that the Company’s water system is not in compliance with ADWR requirements, as the Company failed to file the System Water Plan and Annual Service Area Distribution Maps.

Arizona Corporation Commission (“ACC”) Compliance

On October 2, 2013, the Utilities Division Compliance Section indicated that the Company has no delinquent ACC compliance items.

Curtailment Tariff

The Company has an approved Curtailment Tariff.

Backflow Prevention Tariff

The Company has an approved Backflow Prevention Tariff.

Conclusions/Recommendations

1. The Company current system’s source production capacity (combined with the use of the Tucson Water emergency interconnect) is adequate to serve the Halcyon current customer base and reasonable growth, but lacks independent storage capacity to serve the future Project. As an alternative to independent storage capacity, an additional interconnection(s) with Tucson Water could satisfy the storage capacity deficiency.

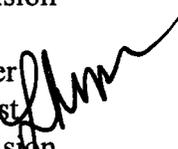
³ The LEA was approved by the Commission on December 5, 2012

⁴ Per ADEQ Compliance Status Reports dated October 13, 2013.

2. The Company is in compliance with ADEQ regulations and has no delinquent Commission compliance issues.
3. Staff recommends that the Company be required to file with Docket Control, as a compliance item in this docket within 90 days of the effective date of this Decision, documentation from ADWR indicating that the water system is compliant with departmental requirements governing water providers and/or community water systems.

MEMORANDUM

TO: Bob Gray
Executive Consultant III
Utilities Division

FROM: Lori H. Miller 
GIS Specialist
Utilities Division

THRU: Del Smith 
Engineering Supervisor
Utilities Division

DATE: March 26, 2014

RE: **HALCYON ACRES ANNEX NO. 2 WATER COMPANY, INC.**
(DOCKET NO. W-02312A-13-0326)
AMENDED LEGAL DESCRIPTION

The area requested by Halcyon for a partial deletion has been plotted with no complications using the amended legal description filed on March 13, 2014 (a copy of which is attached).

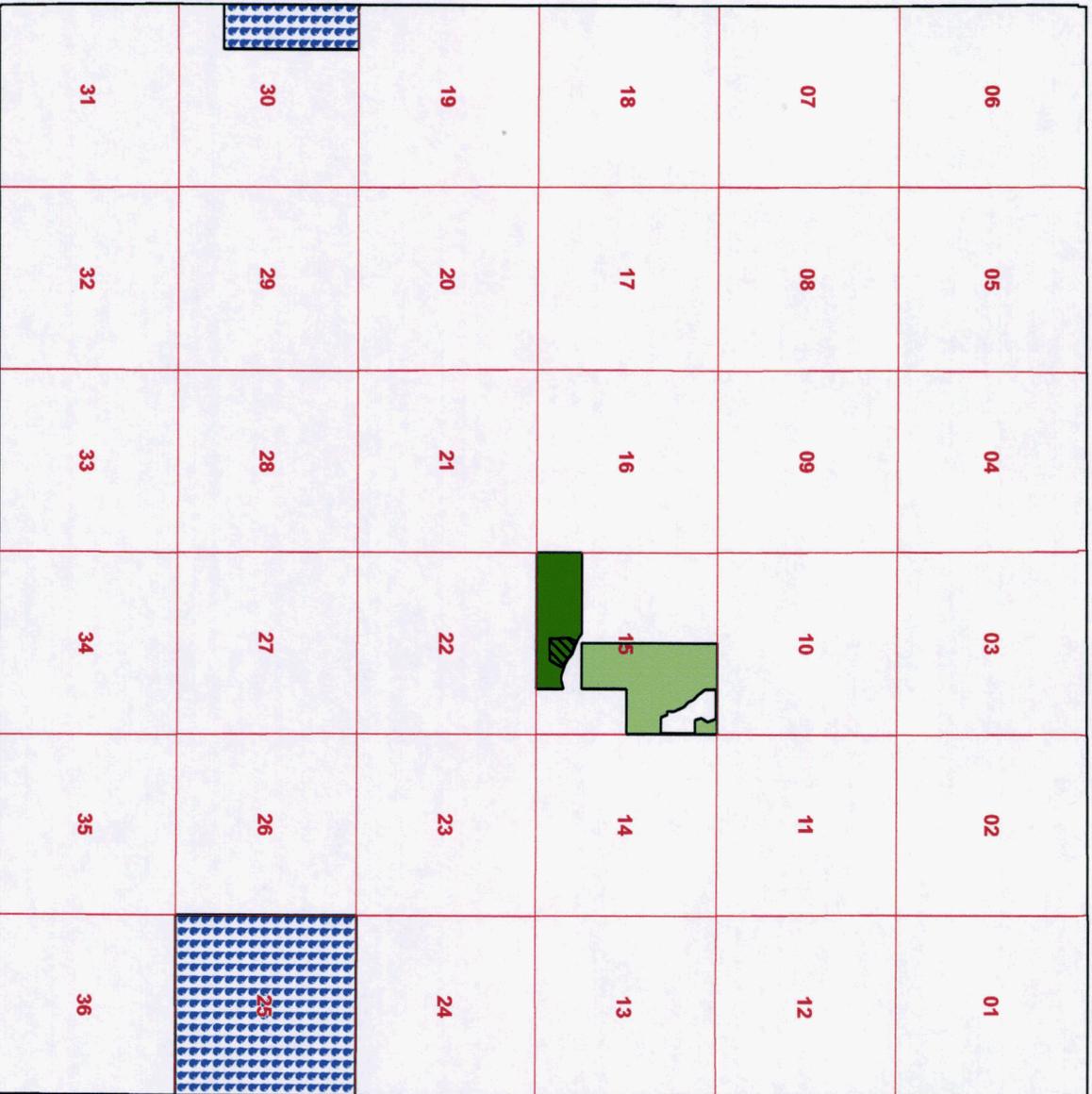
Also attached is a copy of the map for your files.

/lhm

Attachments

cc: Mr. Gregory E. Good
Mr. Thomas H. Campbell
Ms. Katrin Stukov
Ms. Deb Person (Hand Carried)
File

RANGE 15 East



TOWNSHIP 14 South



W-02312A (1)

Halcyon Acres Annex #2 Water Company, Inc.



W-01953A (1)

Halcyon Acres Water Users Association



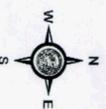
(8)

City of Tucson (Nonjurisdictional)



W-02312A (1)

Halcyon Acres Annex #2 Water Company, Inc
 Docket No. W-02312A-13-0326
 Partial Deletion



Prepared by:
 Arizona Corporation Commission
 Utilities Division
 Engineering Section/GIS Mapping
 602-542-4251



LEGAL DESCRIPTION

THE PLACE AT PRESIDIO TRAIL BLOCK 1, A SUBDIVISION WITHIN THE CITY OF TUCSON, PIMA COUNTY, ARIZONA, RECORDED AT SEQUENCE 20122680359, RECORDS OF THE PIMA COUNTY RECORDER, BEING WITHIN THE SOUTH HALF OF SECTION 15, TOWNSHIP 14 SOUTH, RANGE 15 EAST, GILA AND SALT RIVER MERIDIAN, PIMA COUNTY, ARIZONA, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHEAST CORNER OF SAID SECTION 15 AS MONUMENTED BY A BRASS DISC SURVEY MONUMENT;

THENCE SOUTH 89°26'07" WEST 2645.24 FEET UPON THE SOUTH LINE OF THE SOUTHEAST QUARTER OF SAID SECTION 15 TO THE SOUTH ONE QUARTER CORNER THEREOF, AS MONUMENTED BY ANOTHER BRASS DISC SURVEY MONUMENT;

THENCE NORTH 42°48'20" EAST 1032.64 FEET TO THE **POINT OF BEGINNING** AT THE MOST EASTERLY CORNER OF SAID **THE PLACE AT PRESIDIO TRAIL BLOCK 1** MONUMENTED BY A HALF INCH REBAR WITH IDENTIFICATION TAG, LS 17479;

THENCE THE FOLLOWING COURSES UPON THE BOUNDARY OF SAID **THE PLACE AT PRESIDIO TRAIL BLOCK 1**;

SOUTH 29°05'08" WEST 422.62 FEET;

SOUTH 89°51'50" WEST 619.68 FEET TO A NON-TANGENT CURVE CONCAVE NORTHERLY, THE RADIUS POINT OF SAID CURVE BEARS NORTH 00°13'14" WEST;

WESTERLY UPON THE ARC OF SAID CURVE TO THE RIGHT, HAVING A RADIUS OF 25.00 FEET AND A CENTRAL ANGLE OF 23°18'44", FOR AN ARC DISTANCE OF 10.17 FEET TO A NON-TANGENT LINE;

NORTH 00°29'11" WEST 595.46 FEET TO A TANGENT CURVE CONCAVE EASTERLY;

NORTHERLY UPON THE ARC OF SAID CURVE TO THE RIGHT, HAVING A RADIUS OF 35.00 FEET AND A CENTRAL ANGLE OF 27°48'42", FOR AN ARC DISTANCE OF 16.99 FEET TO A TANGENT LINE;

NORTH 27°19'31" EAST 165.87 FEET TO A TANGENT CURVE CONCAVE SOUTHERLY;

EASTERLY UPON THE ARC OF SAID CURVE TO THE RIGHT, HAVING A RADIUS OF 25.00 FEET AND A CENTRAL ANGLE OF 84°04'44", FOR AN ARC DISTANCE OF 36.69 FEET TO A TANGENT LINE;

SOUTH 68°35'45" EAST 269.55 FEET TO A TANGENT CURVE CONCAVE SOUTHWESTERLY;

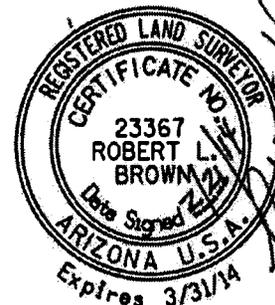
SOUTHEASTERLY UPON THE ARC OF SAID CURVE TO THE RIGHT, HAVING A RADIUS OF 666.20 FEET AND A CENTRAL ANGLE OF 16°02'39", FOR AN ARC DISTANCE OF 186.55 FEET TO A TANGENT LINE;

SOUTH 52°33'06" EAST 192.16 FEET TO A TANGENT CURVE CONCAVE NORTHEASTERLY;

AND SOUTHEASTERLY UPON THE ARC OF SAID CURVE TO THE LEFT, HAVING A RADIUS OF 766.20 FEET AND A CENTRAL ANGLE OF 14°10'53", FOR AN ARC DISTANCE OF 189.64 FEET TO THE **POINT OF BEGINNING**.

CONTAINING 10.8 ACRES MORE OR LESS

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3945 EAST FORT LOWELL ROAD - SUITE 111
TUCSON, AZ 85712
520.795.1000
(FAX) 520.322.6956

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PAGE 2 OF 2

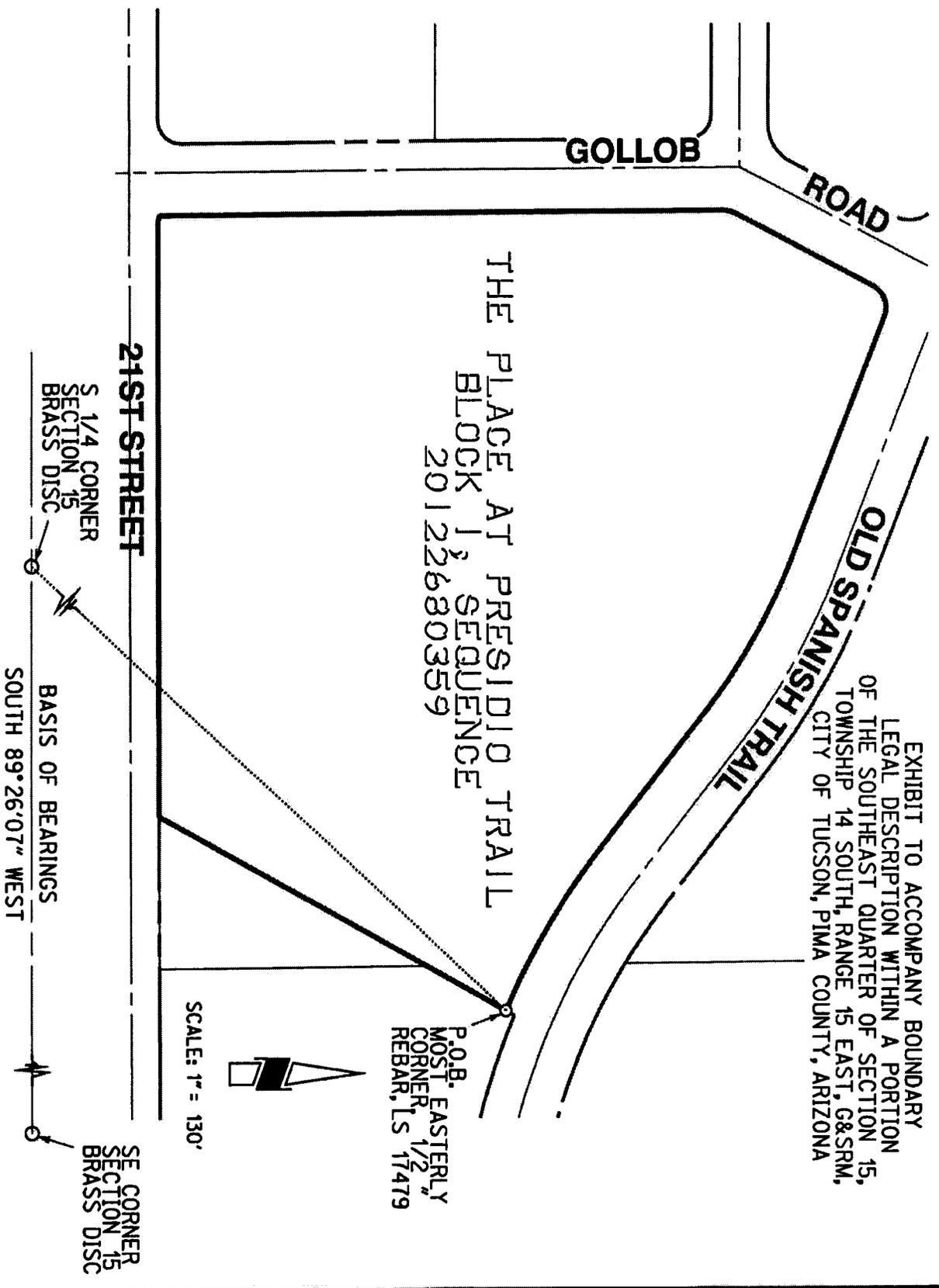


EXHIBIT TO ACCOMPANY BOUNDARY
LEGAL DESCRIPTION WITHIN A PORTION
OF THE SOUTHEAST QUARTER OF SECTION 15,
TOWNSHIP 14 SOUTH, RANGE 15 EAST, G&SRM,
CITY OF TUCSON, PIMA COUNTY, ARIZONA

THE PLACE AT PRESIDIO TRAIL
BLOCK 1 & SEQUENCE
201122680359

21ST STREET

GOLLOB ROAD

OLD SPANISH TRAIL

P.O.B. MOST EASTERLY
CORNER, 1/2
REBAR, LS 17479

S 1/4 CORNER
SECTION 15
BRASS DISC

BASIS OF BEARINGS
SOUTH 89°26'07" WEST

SE CORNER
SECTION 15
BRASS DISC

SCALE: 1" = 130'

