



Coalition for Sonoran Desert Protection

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September 27, 2019

Arizona Center for Law in the Public Interest
Arizona Native Plant Society
Bat Conservation International
Cascabel Conservation Association
Center for Biological Diversity
Center for Environmental Ethics
Defenders of Wildlife
Desert Watch
Environmental Law Society
Friends of Cabeza Prieta
Friends of Ironwood Forest
Friends of Madera Canyon
Friends of Saguaro National Park
Friends of Tortolita
Gates Pass Area Neighborhood Association
Genius Loci Foundation
Native Seeds / SEARCH
Protect Land and Neighborhoods
Safford Peak Watershed Education Team
Save the Scenic Santa Ritas
Sierra Club – Grand Canyon Chapter
Sierra Club – Rincon Group
Sky Island Alliance
Society for Ecological Restoration
Southwestern Biological Institute
Tortolita Homeowners Association
Tucson Audubon Society
Tucson Herpetological Society
Tucson Mountains Association
Wildlands Network

Cynthia Ross, Senior Planner
Planning Department
Town of Marana
11555 W. Civic Center Drive
Marana, AZ 85653

Dear Ms. Ross,

Thank you for the opportunity to comment on Marana’s Draft General Plan (“General Plan”) as we have done with past General Plan proposals.

We would first like to thank the Town for its previous work on conservation planning, which is integral to land use planning. These efforts include Tres Rios del Norte; Marana’s Draft Habitat Conservation Plan; the Santa Cruz River Corridor Study; the Environmental Resource Preservation, Native Plant Protection, and Landscape Requirements Ordinance; and the on-going implementation and management of El Rio Preserve. It is important that all these efforts move forward in an integrated, holistic and simultaneous fashion, which is why we are pleased to see language in the General Plan that combines all these previous efforts into a future Open Space and Wildlife Conservation Plan.

The Coalition continues to work to ensure that important lands are not only protected in perpetuity but also connected, including the protection of wildlife linkages open space and the construction of wildlife crossing infrastructure. We are pleased to have participated in a Focus Group on Resource and Sustainability last year as part of the General Plan update process.

The Coalition is generally supportive of the goals included in the General Plan, with a few exceptions. Attached are specific language revisions that we recommend to the Resource and Sustainability Goals and Implementation Actions in the Tables provided by staff. Goals and Actions that we strongly agree with are highlighted in yellow.

Additionally, we feel strongly that resource and conservation actions should be integrated with other General Plan actions, as that is the only avenue to attain conservation in a land use General Plan. As such, we have outlined below our constructive feedback, comments, and recommendations on other Goals and Actions located in sections other than Resource and Sustainability:

1. We strongly disagree with the designation of a Special Planning Area for state trust lands. These lands are currently designated as Low Density, and in the Draft

Habitat Conservation Plan for the Tortolita Fan area, the following language was approved by Mayor and Council as part of the process:

“Limit surface disturbance within developments to 60%. The area addressed by this measure will consist of all lands within the Town that are north of Cortaro Road, south of the Pima/Pinal County Line, east of the CAP canal and an alignment that runs approximately ½-mile east of Interstate-10, and west of the Town’s eastern boundary.”

Again, all three of these proposed Special Planning Areas are currently designated as Low Density. Should there be changes proposed, these parcels should go through the regular two-step (Plan Amendment then Rezoning) process, with public participation, and include land set-asides as laid out in the Draft Habitat Conservation Plan. The Resources and Sustainability Goals in the General Plan need to be reflected in the overall General Plan or they are meaningless.

2. As such, we disagree with the addition of Special Planning Areas in general. Please delete all Goals under BE-12.
3. Table 1-1: Major Plan Amendments signify “significant alterations” to current General Plan categories that are proposed. As such, anything currently designated as Open Space that is proposed for development would be a Major Plan Amendment. Currently, the only category that is considered major is Open Space to Airport (A). Please revise.
4. The Tortolita Preserve needs to be identified on all Town maps. We disagree with the Town’s interpretation of A.R.S. § 9-461.06 that because the preserve is leased, that it cannot be displayed on maps or otherwise referred to as a “preserve.” The General Plan is a 10-year document, and there is an 81-year period left in the lease agreement. If the Town feels that it cannot be labeled “Preserve” due to the “in perpetuity” language, then the land should be delineated and labeled as “Open Space Park.” Please revise.
5. Section 4-14 States:

“Since Marana’s planning area is largely undeveloped there are many opportunities to protect these resources, fostering a healthy ecosystem. Over the years, the Town has completed several documents that are used as guidance but have not been formally adopted due to the delisting of endangered or threatened species and change in federal and state regulations. Some of these documents include the Tres Rios del Norte Feasibility Study (between City of Tucson, Pima County, Marana, and the US Army Corps of Engineers), the Draft Habitat Conservation Plan (Developed for the listing of the Cactus Ferruginous Pygmy Owl), the Santa Cruz River Corridor Study, and the Sonoran Desert Conservation Plan. The Town intends to review these documents and combine these efforts into one Open Space and Wildlife Conservation Plan, which will guide future natural resource conservation in the future.”

The Open Space and Wildlife Conservation Plan should be developed and approved *prior to or simultaneously with* the adoption of the General Plan, in order to better guide future growth. Resource protection and conservation need to be *integrated with* land use plans, not viewed as an unrelated goal or addendum. (See comments above regarding Special Planning Areas.)

6. The General Plan is incorrect in its depiction of the Draft Habitat Conservation Plan. Section 4-15 (again) states in part:

“(T)he Draft Habitat Conservation Plan (Developed for the listing of the Cactus Ferruginous Pygmy Owl).”

However, the Draft Habitat Conservation Plan was developed for 13 species. The Federal Register clearly states this:

“If we approve it, the 25-year permit would authorize the proposed incidental take of 13 covered species, including species currently listed under the Act, as well as species that may become listed under the Act in the future: (1) Lesser long-nosed bat; (2) Southwestern willow flycatcher; (3) Yellow-billed cuckoo; (4) Cactus ferruginous pygmy-owl; (5) Lowland leopard frog; (6) Talus snails; (7) Tucson shovel-nosed snake; (8) Ground snake; (9) Sonoran desert tortoise; (10) Merriam's mouse; (11) Mexican garter snake; (12) Burrowing owl; and (13) Pale Townsend's big-eared bat.” (June 21, 2007)

Please revise the text of the General Plan to reflect this.

7. Wildlife connectivity open space across Tangerine Road needs to be protected *and buffered*. Wildlife crossings have been installed along Tangerine Road at public expense (by the Regional Transportation Authority) and need to function as they are intended. Without adequate buffers, wildlife is unlikely to use the crossings.
8. Prospect Wash wildlife connectivity across Tangerine Road and Moore Road needs to be preserved as NUOS *and buffered*. In addition to Tangerine Road, open space is necessary across Moore Road in order for wildlife movement to continue to the Tortolita Preserve and on to the Tortolita Mountains.
9. Figure 2-X depicts a new interstate, Interstate 11, running west of the Tucson Mountains. Given the current planning timeline for Interstate 11 and the fact that a Preferred Alternative Route has not been chosen, please delete the route and both spurs back to Interstate 10 from your Future Circulation map. The construction of Interstate 11 is well outside of the planning horizon for this General Plan, whether Interstate 11 ends up being built as an I-10 bypass west of the Tucson Mountains or at all.

10. As we have stated before, we disagree with the Lambert Lane extension, which bisects a Regional Wildlife Linkage, the Tortolita-Tucson Mountains Wildlife Linkage. Please delete.
11. As we have stated before, we disagree with a new road (Cayton Road) from Dove Mountain Blvd / Heritage Club Blvd southeast to Thornydale Road. This would disrupt wildlife movement through the Tapestry development across Prospect Wash. Please delete.
12. Marana should respect and adopt the Pinal Open Space and Trails Plan if they annex into Pinal County.
13. On page 2-40-41, we agree with the goals in the Built Environment section, Goals BE 11, Policies BE 11-1 through 11-6, and Goals BE 22, Policies BE 22-1 through BE 22-4.
14. On page 3-7, per the section on the Tangerine Road Corridor, please add an additional bullet that reads:

RTA-funded wildlife crossings will remain undeveloped with at least 300-foot wide NUOS on either side throughout the corridor, and wider through Prospect Wash.
15. On page 3-18, in the last bullet entitled Special Purpose Parks, please add to the end of the last sentence, “such as Tortolita Preserve (or Tortolita Open Space Park).”
16. On page 3-27, under Goal PC-1, please add:

Policy PC 1-5. Ensure that Economic Vitality does not conflict with Resources and Sustainability Goals.
17. While many of the implementation actions listed in the Resources and Sustainability tables, if adopted and followed, will help mitigate the on-going effects of climate change, an action should be added that will "develop and implement a Climate Resilience and Emergency Readiness Plan."

We can support this document with the changes we have recommended, including edits we made to the attached Tables.

Thank you again for the opportunity to comment on this draft of the Marana General Plan. Please contact me with any questions.

Sincerely,



Carolyn Campbell
Executive Director

2040 General Plan Goals, Policies, and Actions Review – 60 DAY REVIEW DRAFT	Additional Info
<p>Conservation – Resources & Sustainability</p> <p>Goal RS-11. Marana promotes the protection, conservation, and long-term sustainability of its distinct natural environment.</p> <p>Policy RS 11-1. Develop and adopt an Open Space and Wildlife Conservation Master Plan to establish a vision of open space throughout the Town.</p> <p>Policy RS 11-2. Through an Open Space and Wildlife Conservation Plan, identify open spaces that are development-sensitive <u>or development-free</u>.</p> <p>Policy RS 11-3. Seek innovative methods for acquiring and preserving important natural resources.</p> <p>Policy RS 11-4. Continue to work with Arizona State Land Department to preserve <u>and adequately buffer</u> major wash corridors throughout Marana.</p> <p>Policy RS 11-5. Establish invasive species prevention measures and regulations to continuously monitor, manage, and remove invasive species.</p> <p>Policy RS 11-6. Ensure that development has designated collective natural undisturbed open spaces and that they are maintained and managed properly by homeowners’ associations <u>or other entities</u>.</p> <p>Policy RS 11-7. Promote habitat <u>creation</u> and species <u>introduction and protection</u> creation at water recharge facilities.</p>	
<p>IMPLEMENTATION ACTION ITEMS</p> <p>20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards <u>for to encourage</u> environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MID-TERM</p> <p>21 Amend the Land Development Code to enable lot size reductions to be granted administratively for a parallel increase in natural open space conservation. MID-TERM</p> <p>117 Consider developing and the adoption of wildlife-sensitive development policies. SHORT-TERM</p> <p>134 Update hillside development standards in the Land Development Code. MID-TERM</p> <p>135 identify and monitor wildlife and vegetation associated with water recharge facilities. MID-TERM</p>	
<p>Goal RS-12. Development is integrated and compatible with sensitive Sonoran Desert landscape.</p> <p>Policy RS 12-1. Work with developers <u>and Coalition for Sonoran Desert Protection and others</u> to conserve natural resources within new developments, including hillsides, wildlife corridors, and native vegetation.</p> <p>Policy RS 12-2. <u>Review and assess Land Development Code standards for preservation of natural undisturbed open space</u>.</p> <p>Policy RS 12-3. Update the hillside development regulations to limit development impacts on steep slopes.</p> <p>Policy RS 12-4. Consider creating land development guidance that recognizes development sensitive areas, such as washes, floodplains, and steep <u>slopes</u>.</p> <p>Policy RS 12-5. Explore conservation development strategies that maintain density and permit lot size reductions administratively in exchange for a parallel increase in conserving natural undisturbed open space.</p> <p>Policy RS 12-6. Consider adopting cluster development standards in the Land Development Code that permit density bonuses for protecting development sensitive natural resources and open spaces in Marana, using methods such as conservation easements.</p>	
<p>20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards <u>for to encourage</u> environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MID-TERM</p> <p>21 Amend the Land Development Code to enable lot size reductions to be granted administratively for a parallel increase in natural open space conservation. MID-TERM</p> <p>131 Secure funding to minimize the impacts of flooding risk for the areas adjacent to the Santa Cruz River. MID-TERM</p> <p>136 Update the Land Development Code to include standards for cluster development, which permit density bonuses for the protection of development sensitive natural resources and open spaces. LONG-TERM</p>	

Commented [CC1]: This should be done prior to the approval of the General Plan so as to be consistent and guide land use planning.

Commented [CC2]: Doesn't Town have this?

<p>Goal RS-13. Marana fosters wildlife movement across the community, connecting wildlife to surrounding natural areas.</p> <p>Policy RS 13-1. Through an Open Space and Wildlife Conservation Master Plan, identify wildlife habitats and linkages.</p> <p>Policy RS 13-2. Work with developers <u>and Coalition for Sonoran Desert Protection and others</u> to conserve and incorporate designated natural washes and drainageways within development to accommodate wildlife movement.</p> <p>Policy RS 13-3. Partner with Pima County and other regional stakeholders to seek opportunities for preserving wildlife movement by linking major regional open spaces.</p> <p>Policy RS 13-4. Regularly research best practices for preserving natural undisturbed open spaces to maintain wildlife connectivity, in a manner that is compatible with future growth.</p> <p>Policy RS 13-5. Continue to develop capital improvements at the El Rio Preserve along the Santa Cruz.</p>	
<p>20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards for to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MID-TERM</p>	
<p>40 Conduct a feasibility analysis of providing infrastructure to support wildlife crossings in appropriate areas. ON-GOINGLONG-TERM</p>	
<p>41 Develop infrastructure that provides for environmentally sensitive roadway design and construction standards. ON-GOINGLONG-TERM</p>	
<p>117 Consider developing and the adoption of wildlife-sensitive development policies. SHORT-TERM</p>	
<p>118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING</p>	
<p>121 Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING</p>	
<p>137 Develop and adopt an Open Space and Wildlife Conservation Master Plan that focuses on open space preservation, wildlife linkages, and wildlife habitats. LONG-TERM</p>	
<p>138 Study the design and feasibility of incorporating wildlife crossings within wildlife corridors <u>when feasible</u>. SHORT-TERM</p>	
<p>139 Continue to pursue community partnerships at the El Rio Preserve along the Santa Cruz to enhance environmental education programs. ON-GOING</p>	

Commented [CC3]: Studies have been done identifying needs through ADOT, AZGFD (2006), Dr. Paul Beier of NAU, and most recently RTA (2012)

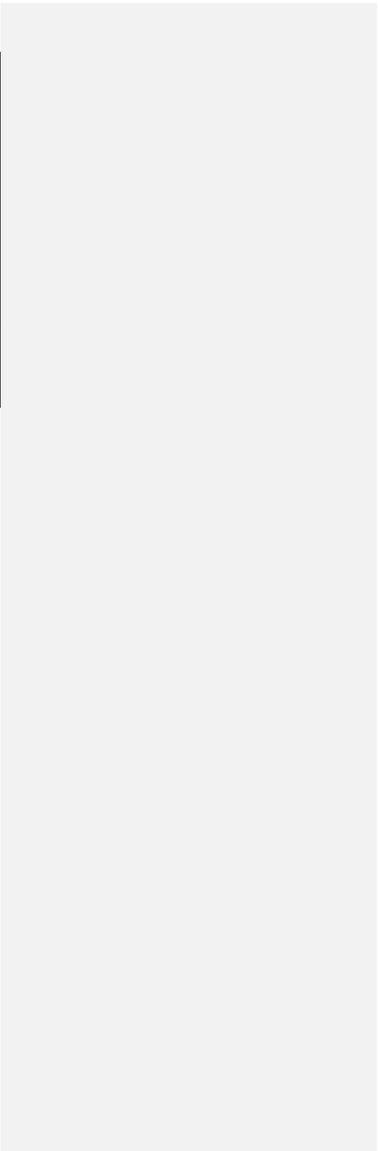
Commented [CC4]: Dependent on available funding.

Commented [CC5]: Prior to adoption of General Plan Update

2040 General Plan Goals, Policies, and Actions Review – 60 DAY REVIEW DRAFT	Additional Info
<p>Environmental Planning – Resources & Sustainability</p> <p>Goal RS-7. New developments are constructed in a manner that minimizes floods.</p> <p>Policy RS 7-1. Encourage and incentivize the use of Low Impact Development techniques, such as rain water harvesting, as a tool for reducing post-development runoff.</p> <p>Policy RS 7-2. Connect regional active and passive recreational sites along the Santa Cruz River.</p> <p>Policy RS 7-3. Study and seek funding for flood control projects that reduce the extent of the 100-year floodplain in a sustainable manner.</p> <p>Policy RS 7-4. Require developers to pay for drainage facilities within their proposed development.</p> <p>Policy RS 7-5. Seek to obtain grant funding to implement regional drainage facilities.</p>	
<p>IMPLEMENTATION ACTION ITEMS</p> <p>20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards for to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. NEAR/MID-TERM</p> <p>118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING</p> <p>121 Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING</p> <p>127 Implement recommendations of the Northwest Marana Master Drainage Study. ON-GOING</p> <p>128 Develop low impact design techniques for development within the 100-year floodplain. SHORT-TERM</p> <p>129 Update the Land Development Code to require low-impact development standards. SHORT-TERM</p> <p>130 Develop standards in the Land Development Code for detention basin use and location. NO TIME FRAME ASSIGNED</p>	
<p>Goal RS-8. Stormwater is efficiently and sustainably managed in a way that reduces flood risks and respects water quality.</p> <p>Policy RS 8-1. Review, assess, and update the Stormwater Master Plan to comply with Arizona Department of Environmental Quality standards.</p> <p>Policy RS 8-2. Preserve and protect existing primary natural drainage systems.</p> <p>Policy RS 8-3. Consider establishing sustainable stormwater methods, such as green infrastructure and pervious pavements, in new development.</p>	
<p>122 Continue to identify programs for water conservation, including stormwater harvesting. ON-GOING</p> <p>132 Implement strategies developed in the Northwest Marana Master Drainage Study. MID-TERM</p>	
<p>Goal RS-9. Marana protects its major water corridors from erosion.</p> <p>Policy RS 9-1. Protect the Santa Cruz River from erosion and flooding.</p> <p>Policy RS 9-2. Identify options for expanding bank protection improvements along the north and south bank of the Santa Cruz River.</p>	
<p>97 Update the Santa Cruz Corridor Master Plan. SHORT-TERM</p> <p>118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING</p> <p>121 Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING</p> <p>133 Seek funding for continued bank enhancement and protection measures along the Santa Cruz River to reduce the risks of erosion and flooding. LONG-TERM</p>	

Commented [CC1]: Policies to encourage; codes to regulate

	Time Frames	Short Term (1-5 Yrs)	Mid Term (5-10 Yrs)	Long Term (11 + Yrs)	On-going
Goal RS-10. Marana proactively addresses wildfire hazards in the wildland-urban interface.					
Policy RS 10-1. Continue to support the implementation of the Pima County Community Wildfire Protection Plan.					
Policy RS 10-2. Identify wildfire hazard areas in Marana, and adopt associated buffer standards.					
Policy RS 10-3. Proactively manage wildland vegetation in developed areas to reduce the amount of fire fuels, including Buffelgrass.					
Policy RS 10-4. Produce and promote fire-safety educational materials for the community.					
Policy RS 10-5. Encourage ignition-resistant materials and construction techniques.					
118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING					
121 Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING					



2040 General Plan Goals, Policies, and Actions Review – 60 DAY REVIEW DRAFT		Additional Info
Open Space – Resources & Sustainability		
<p>Goal RS-1. The Santa Cruz River is an iconic open space spine through Marana.</p> <p>Policy RS 1-1. Work with the Pima County Regional Flood Control District to establish the Santa Cruz River as an active and passive open space corridor.</p> <p>Policy RS 1-2. Connect regional active and passive recreational sites along the Santa Cruz River.</p> <p>Policy RS 1-3. Encourage low-impact development standards along the Santa Cruz River Corridor that include habitat protection, flood control, and recreation.</p> <p>Policy RS 1-4. Continue to connect Shared Use Paths along the Santa Cruz River that ultimately achieve connectivity to Downtown Marana.</p> <p>Policy RS 1-5. Evaluate current and future mineral extraction sites for potential reuse once the exaction activities are concluded, such as water detention, wildlife refuge areas, or recreational parks.</p>		
No implementation action items. Need to assign actions.		
<p>Goal RS-2. Marana’s dedication to preserving the Sonoran Desert environment contributes to the Town’s aesthetic character.</p> <p>Policy RS 2-1. Through the rezoning process, ensure that where possible, encourage developers to maintain open space, view corridors, and wildlife connectivity in new development to ensure that development does not block wildlife crossings and their connecting corridors.</p> <p>Policy RS 2-2. Establish guidelines for buffering natural open spaces from development.</p> <p>Policy RS 2-3. Where appropriate, coordinate with regional agencies and neighboring jurisdictions to establish and manage open space and incorporate conservation measures into future long-range planning efforts.</p> <p>Policy RS 2-4. Work with the Arizona State Land Department to protect significant open space in the Tortolita Foothills as the area is developed.</p> <p>Policy RS 2-5. Advocate that the efforts of the Arizona State Land Department to preserve high-quality natural undisturbed open space.</p>		
<p>IMPLEMENTATION ACTIONS</p> <p>20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MIDNEAR-TERM</p> <p>21 Amend the Land Development Code to enable lot size reductions to be granted administratively for a parallel increase in natural open space conservation. NEARMID-TERM</p> <p>91 Work with developers of master planned communities to secure recreational facilities, open spaces, linear parks, and/or pathways. ON-GOING</p> <p>117 Consider developing the adoption of wildlife-sensitive development policies. SHORT-TERM</p> <p>118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING</p>		

<p>Goal RS-3. Residents enjoy the vast open spaces within and surrounding Marana through an expansive regional trail network and passive recreational opportunities accessible to all community members.</p> <p>Policy RS 3-1. Identify an integrated system of trails through open spaces that connects to Marana’s on-street bike and pedestrian network in the Parks and Recreation Master Plan.</p> <p>Policy RS 3-2. Adopt trail requirements in accordance with the adopted Parks and Recreation Master Plan for future residential developments.</p> <p>Policy RS 3-3. Coordinate with the Bureau of Land Management and National Park Service to connect future trail extensions to current and future trailheads at the Ironwood Forest National Monument and Saguaro National Park.</p> <p>Policy RS 3-4. Coordinate trail extensions with surrounding jurisdictions, including Pima County, Pinal County, the City of Tucson, and the Town of Oro Valley for regional connectivity.</p> <p>Policy RS 3-5. <u>When appropriate, encourage</u> multiuse trails within the erosion hazard setback for natural watercourses.</p> <p>Policy RS 3-6. Adopt design and construction standards for future trails that minimize impacts to the natural environment.</p> <p>Policy RS 3-7. Consider educational kiosks along trails in preserved open space that inform and educate trail users on the Sonoran Desert and other interesting local facts.</p>	
<p>89 Implement recommendations in the 10 Year Town of Marana Parks & Recreation Department Master Plan 2020 – 2030, an update to the Town of Marana Parks and Recreation Master Plan. LONG-TERM</p> <p>119 Update the Parks and Recreation Master Plan to include policies and best practices for providing education material related to environmental and conservation issues to the community. SHORT-TERM</p> <p>120 Plan future trails with sufficient spacing for wildlife use. LONG-TERM</p>	

Commented [CC1]: What does this mean? The human/public trail itself will be wider so animals can use?