



Coalition for Sonoran Desert Protection

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October 8, 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

Mayor Ed Honea and Councilmembers
Town of Marana
11555 W. Civic Center Drive
Marana, Arizona 85653

RE: Discussion and Direction of Rezoning of State Land and Reconfigured Tortolita Preserve

Dear Mayor and Councilmembers:

Please accept feedback on the above-mentioned Study Session item regarding the “Reconfigured Tortolita Preserve” being discussed this evening. The Coalition supports protection of the Tortolita Preserve in perpetuity, and we understand that this larger rezoning process may well be the best avenue to do that.

The Tortolita Preserve was established in consultation, as required by the Endangered Species Act, with the U.S. Fish and Wildlife Service as mitigation for habitat disturbance and effects to listed species resulting from the construction of Dove Mountain. While the Preserve was established specifically for mitigation for the then-listed endangered cactus ferruginous pygmy-owl and lesser long-nosed bat, this area of unique ironwood/saguaro habitat is a core preserve that supports a multitude of important Sonoran Desert species.

Additionally, many additional conservation actions were guided by the establishment of the Tortolita Preserve. The Town, Pima County, the Regional Flood Control District, the Regional Transportation Authority (RTA), Tucson Electric Power (TEP), and private landowners have all contributed to a system of core preserves and connectivity lands in the Tortolita-Tucson Mountains wildlife linkage. Some examples include: 1) on the east side of I-10 are Cascada North Open Space and a TEP Conservation Easement (not completed); and 2) on the west side of I-10 are county properties known as Wexler and Parsons, El Rio Preserve, Los Morteros, and open space within the Lazy K Bar development. Both the draft Habitat Conservation Plan and the General Plan recognize this regional wildlife linkage and the need to protect two fingers of land within it (as mapped in the attachments).

Additionally, and not unimportantly, the RTA Board approved funding for three wildlife crossing on Tangerine Road within the proposed rezoning area that are scheduled to be constructed in Phase 2 of the Tangerine Road improvement project.

From a biological perspective and in order to function for wildlife needs, the Preserve or a portion of it, should stay intact as a “core area,” and any lands protected in a reconfiguration would need to connect with other preserved lands and constructed wildlife crossings. In other words, the goal for this area should still be to protect and maintain core habitat in this unique ecological setting with habitat connectivity that is ecologically meaningful by either: 1) connecting with other core habitats or, 2) maintaining habitat connectivity through areas that have been or will be impacted by development. The currently proposed reconfiguration does not meet these important ecological and biological

goals. By achieving such goals, maintaining the biological integrity of the Tortolita Fan may prevent the need for future listings under the Endangered Species Act, including the pygmy-owl and desert tortoise which are currently being reevaluated for listing as a result of ongoing litigation.

We met with the Arizona State Land Department (ASLD) and Town staff recently to discuss the proposal and our response to it. We appreciate the ASLD's interest in assisting the Town in permanent protection of biologically important lands. However, I believe the ASLD were unaware of many of the local conservation efforts described above, and therefore the proposal does not align with existing preserves. The proposal seems to be based on drainage needs rather than wildlife habitat protection and connectivity. We also appreciate ASLD's willingness to protect more acreage in their approach than what is currently set aside as the Tortolita Preserve. I do want to stress that the acreage is not necessarily the most important thing but rather the functionality of the lands.

Attached are two Alternatives that we could support that reflect the positive work that has been accomplished over the last many years. Also reflected are specific locations of those conservation actions. Additionally, we make the following recommendations:

1. A portion of the existing Tortolita Preserve should remain intact. The exact location is not reflected on the map but should be negotiated.
2. We would support a larger area for the Rezoning Area. We request that if the Rezoning Area were to be extended northwest, that additional lands be preserved extending connectivity to Cochie Canyon in Tortolita Mountain Park.

Thank you so much for the opportunity to comment on this proposal. We would like to continue to be involved in discussions, should this proposal move forward. I will be attending the Study Session this evening and will be available to comment if requested.

Sincerely,



Carolyn Campbell
Executive Director

Attachments (2)

0 2,500 ft



Pima County
Cochie Canyon

Town of Marana
Section 7/10 Mitigation

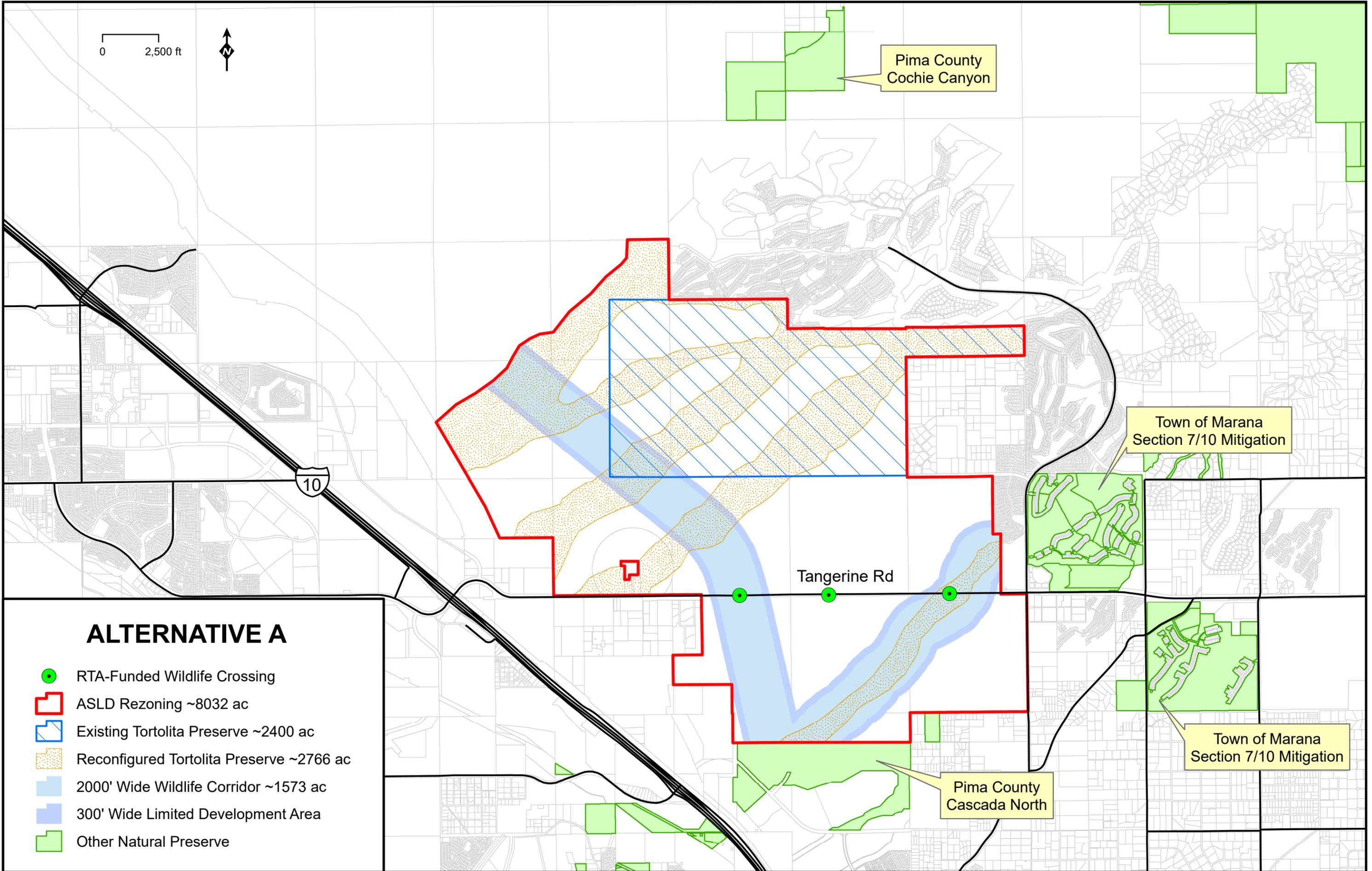
Tangerine Rd

Town of Marana
Section 7/10 Mitigation

Pima County
Cascada North

ALTERNATIVE A

-  RTA-Funded Wildlife Crossing
-  ASLD Rezoning ~8032 ac
-  Existing Tortolita Preserve ~2400 ac
-  Reconfigured Tortolita Preserve ~2766 ac
-  2000' Wide Wildlife Corridor ~1573 ac
-  300' Wide Limited Development Area
-  Other Natural Preserve



0 2,500 ft



Pima County
Cochie Canyon

Town of Marana
Section 7/10 Mitigation

Tangerine Rd

Town of Marana
Section 7/10 Mitigation

Pima County
Cascada North

ALTERNATIVE B

-  RTA-Funded Wildlife Crossing
-  ASLD Rezoning ~8032 ac
-  Existing Tortolita Preserve ~2400 ac
-  Reconfigured Tortolita Preserve ~2766 ac
-  2000' Wide Wildlife Corridor ~1643 ac
-  300' Wide Limited Development Area
-  Other Natural Preserve

