



Coalition for Sonoran Desert Protection

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December 9, 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 Dr.
Marana, AZ 85653

Dear Mayor Honea and Councilmembers:

Thank you for the opportunity to comment on Marana's Draft General Plan. We are happy to provide comments, as we have done with past General Plan updates.

We would 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 of El Rio Preserve.

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

The Coalition is generally supportive of the goals and implementation actions included in the General Plan. We support the Planning Commission's recommended changes, as reflected in the tracked changes within the text of the Make Marana 2040 document, with one exception, detailed below. We also support staff's addition of a tenth land use category entitled *Tortolita Preserve*. We hope to continue working with Town officials in pursuing a means to protect the Tortolita Preserve in perpetuity.

It is important that resource conservation and land use planning move forward in an integrated, holistic and simultaneous fashion, and we support the language included in the General Plan to develop an Open Space and Wildlife Conservation Plan. I recently met with staff from the Planning Department and was pleased to hear that there may be an effort undertaken in the near future to develop an Open Space and Wildlife Conservation Plan to be integrated with the General Plan when complete. We applaud the Town's goal and encourage the Town Manager and Mayor and Council to immediately pursue this goal.

We disagree with Special Planning Areas (SPAs) as a land use designation for state trust lands. These lands are currently designated as Low or Rural Density and are called out in the draft Habitat Conservation Plan for the Tortolita Fan area with special guidelines for development. **Please delete Special Planning Areas as a**

Land Use Designation and keep state trust lands in their current designation.

One of the proposed SPAs, named the 885 Property, is on the eastern edge of Marana's Planning Area and outside the current Town Limits. As both the Town and Arizona State Land Department have expressed that they have no interest in annexing or developing these parcels, **please revise the Marana Planning Area boundary so that the east boundary is consistent with the Town municipal boundary.**

Rural Residential Land Use Designation is currently limited to up to one-half (0.5) dwelling unit per acre (du/ac). Low Density Residential allows between one-half (0.5) du/ac and two (2.0) du/ac. Staff and the Commission are recommending changes to both of these land use designations. **Please retain the current Rural Residential and Low Density land use designations.**

While many of the implementation actions listed in the Resources and Sustainability chapter, if adopted and followed, will help mitigate the on-going effects of climate change, **an Implementation Action Item should be added that will "develop and implement a Climate Resilience and Emergency Readiness Plan."**

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

Sincerely,

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive, flowing style.

Carolyn Campbell, Executive Director

Attachment: Summary of Marana General Plan Recommended Changes from CSDP



Summary of Marana General Plan Recommended Changes

December 9, 2019

- 1. Adopt all Planning Commission recommended revisions as voted on at their November 20, 2019 hearing, with the exception of changing Rural Residential and Low Density land use designations, retaining these as they are currently.**
- 2. Add a land use category entitled *Tortolita Preserve*.**
- 3. Begin work toward developing an Open Space and Wildlife Conservation Plan to be integrated with the General Plan when complete.**
- 4. Delete Special Planning Areas as a Land Use Designation and keep state trust lands at their current designation.**
- 5. Revise the Marana Planning Area boundary so that the east boundary is consistent with the Town municipal boundary.**
- 6. Add an Implementation Action Item to “develop and implement a Climate Resilience and Emergency Readiness Plan.”**