



August 8, 2025

Harvey Krauss
Planning Manager, Community Development

Sangeeta Deokar
Planning Supervisor, Community Development

Pinal County Development Services
85 North Florence Street, PO Box 749
Florence, AZ 85132

RE: PZ-PA-011-25 – La Osa Project

Founded in 1998, the **Coalition for Sonoran Desert Protection** is an alliance of regional and national organizations that work together for the long-term conservation of Southern Arizona's Sonoran Desert. The Coalition was a driving force behind the establishment of Ironwood Forest National Monument (IFNM) 25 years ago and the later creation of **Friends of Ironwood Forest**, which works to protect the many biological, geological, archaeological, and historical resources for which the monument was established.

We are writing to strongly oppose the proposed major comprehensive plan amendment PZ-PA-011-25, or the La Osa Project, put forward by the applicant Vermaland, LLC. We strongly counter the claim that "The proposed development will have a positive impact on the surrounding area," as stated in the Narrative Case, and several other weak assessments of the project's compliance with the Pinal County Comprehensive Plan.

Specifically, we share the concerns raised by Commissioners at the July 17, 2025 meeting of the Pinal County Planning and Zoning Commission regarding the project's potential to impact wildlife and habitat, including riparian areas.

We also note that the applicant is seeking to modify the comprehensive plan land use designations for parcels that are directly adjacent to Ironwood Forest National Monument. Over the past 25 years, the public lands of the monument have served as a cornerstone of Pima County's Sonoran Desert Conservation Plan, providing essential wildlife corridors, protecting rare desert habitats, and anchoring the long-term land use planning that underpins Pima County's nationally recognized approach to conservation and growth.

Outdoor recreation at the monument has surged, with visitation numbers now over 125,000 per year — more than a 400% increase since 2016. Many enjoy accessing Ironwood Forest National Monument along Sasco Road, the landscape character of which would be permanently and negatively altered by this proposal.

The Arizona Game and Fish Department Project Report clearly notes the project's overlap with several special areas, including multiple and overlapping wildlife movement areas. These wildlife movement areas are critical for many species, including the last viable desert bighorn sheep population native to the Tucson basin — resident in Ironwood Forest National Monument and a major attraction for visitors. This project would threaten their ability to connect with other desert bighorn sheep populations, a long-term regional conservation goal.

Additionally, Friends of Ironwood Forest are working on an application for the Monument to become an Urban Night Sky Place — a significant honor that will further boost astro tourism in the region, a major economic driver in Southern Arizona. The La Osa Project would hinder this effort and would raise concerns for other astro tourism areas in the region — including nearby Saguaro National Park, which was designated as an International Dark Sky Park under the Urban Night Sky Place program in 2023.

For these reasons and several more, both Pima County and the Town of Marana recently issued resolutions in strong support of Ironwood Forest National Monument and its protections.

Finally, the City of Tucson just this week rejected a proposal for a data center development — and on land of less biological value. The City also committed to developing specific policies and regulations as soon as possible to guide data center development proposals in the future. This application makes no reference to infrastructure and resource needs stemming from the proposal, which are highly likely to worsen the overall impact on the surrounding area.

We urge Pinal County to deny the major comprehensive plan amendments requested for PZ-PA-011-25. We are also available to discuss these concerns further.

Sincerely,

Kate Hotten

Co-Executive Director, Coalition for Sonoran Desert Protection

Christine Flanagan

President, Friends of Ironwood Forest

738 N. 5th Ave., Suite 205, Tucson, Arizona 85705 520.388.9925 www.sonorandesert.org

[Arizona Center for Law in the Public Interest](#) . [Arizona Master Naturalist Association](#) . [Arizona Native Plant Society](#) . [Bat Conservation International](#) . [Cascabel Conservation Association](#) . [Center for Biological Diversity](#) . [Center for Environmental Ethics](#) . [DarkSky Southern Arizona](#) . [Defenders of Wildlife](#) . [Desert Watch Environmental Law Society](#) . [Friends of Ironwood Forest](#) . [Friends of Saguaro National Park](#) . [Friends of Tortolita](#) . [Gates Pass Area Neighborhood Association](#) . [Great Old Broads for Wilderness – Tucson](#) . [Living Desert Alliance](#) . [Native Seeds / SEARCH](#) . [Save the Scenic Santa Ritas](#) . [Sierra Club – Grand Canyon Chapter](#) . [Sierra Club – Nopales Group](#) . [Sky Island Alliance](#) . [Tortolita Alliance](#) . [Tucson Bird Alliance](#) . [Tucson Herpetological Society](#) . [Tucson Mountains Association](#) . [Wildlands Network](#)