



Coalition for Sonoran Desert Protection

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January 2, 2026

Arizona Center for Law in the Public Interest
Arizona Master Naturalist Association
Arizona Native Plant Society
Arizona-Sonora Desert Museum
Bat Conservation International
Cascabel Conservation Association
Center for Biological Diversity
Center for Environmental Ethics
DarkSky Southern Arizona
Defenders of Wildlife
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
Maricopa Bird 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

Mayor Jon Post and Council Members
Marana Town Council
11555 W. Civic Center Dr.
Marana, AZ 85653

RE: Agenda items A2 & A3: Ordinance Nos. 2026.002 & 2026.003

Dear Mayor Post and Council Members,

The Coalition for Sonoran Desert Protection represents 28 national and regional organizations across Southern Arizona, including organizations and residents based in Marana.

On behalf of our coalition, we appreciate the opportunity to provide comments on the proposed data center projects before the Marana Town Council. We recognize the time and effort Town staff and the Council have invested in these applications, and we acknowledge that the proposals offer Marana meaningful economic benefits.

We also respectfully urge the Town Council to continue the upcoming vote to allow additional time to strengthen the conditions of approval to protect the Town, its residents, and its long-term fiscal and planning interests.

Additional time would also **allow for meaningful public review and input**, particularly given that scheduling the rezoning following the holiday season could have limited residents' ability to engage.

While Marana's data center ordinance protects certain direct municipal interests, **approving these projects without additional, enforceable safeguards could expose the Town to significant long-term risks that are difficult — or impossible — to unwind once approvals are granted.**

In particular, we are concerned about:

1. **Financial risk and abandonment.** Numerous economists have voiced concerns that data center construction has been a key factor in preventing a recession in the U.S. — and that the boom isn't likely to last. There is **no assurance that these facilities will be completed, operated long-term, or remain solvent.** If a project stalls or declares bankruptcy, Marana could be left with partially-built infrastructure,

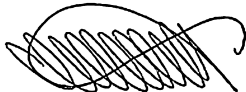
unresolved liabilities, and costly site cleanup. We strongly recommend requiring **binding financial assurances and a decommissioning or site restoration plan** to ensure that costs are not shifted to the Town or its residents.

2. **Escalating and uncertain energy demand.** The energy demands of these projects are substantial and likely to grow over time. Air-cooled data centers use **two to five times more electricity** than water-cooled alternatives. Even if the facilities operate as proposed, Marana cannot assume that Trico and TEP can absorb these loads **without consequences for grid reliability or local ratepayers**. We also note that Trico's letter reads that it can only "*potentially*" serve the project.
3. **Indirect but significant water impacts.** Although the applications focus on direct on-site water use, the **enormous and additional power capacity required to serve these projects will require significant amounts of regional water**, especially if supplied through thermoelectric gas, coal, or nuclear generation. These water demands are currently **absent from the Town's review**, despite the region's ongoing water constraints.

Marana has an opportunity to reduce these risks rather than absorb them. Pima County's recent net-zero energy [Memorandum of Agreement](#) with Beale Infrastructure demonstrates a practical approach to balancing large data center loads alongside more affordable, less water-intensive energy generation. A similar framework in Marana could help **protect grid reliability, stabilize energy costs, reduce water impacts, and demonstrate regional leadership**, rather than locking in long-term vulnerabilities.

Thank you for your consideration and continued service to Marana's community. **We respectfully encourage this vote to be continued to allow for further review of this project's conditions of approval.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Kate Hotten', with a stylized flourish at the end.

Kate Hotten
Co-Executive Director