



May 26, 2026

ATTN: Pinal County Board of Supervisors
Pinal County Administrative Complex
135 N. Pinal Street
Florence, AZ 85132

RE:

Agenda Item 21 (Public Hearing and discussion/approval/disapproval of Ordinance No. 2026-PZ-003-26, an Ordinance approving case PZ-003-26);

Agenda Item 22 (Public Hearing and discussion/approval/disapproval of Ordinance No. 2026-PZ-PD-003-26, an Ordinance approving case PZ-PD-003-26).

Dear Chairman McClure and Members of the Board,

Founded in 1998, the **Coalition for Sonoran Desert Protection** (CSDP) is a regional conservation coalition representing 30 organizations working together for the long-term conservation of Southern Arizona's Sonoran Desert. CSDP played a leading role in the establishment of Ironwood Forest National Monument (IFNM) in 2000 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. Ironwood Forest National Monument spans Pinal County and Pima County.

We write to express concerns regarding the configuration of the proposed La Osa Data Center Project and to **request five modifications** to reduce impacts to regional wildlife movement, open space, and Ironwood Forest National Monument.

We want to emphasize that we are not opposed to development or to the economic opportunities it can provide. Rather, we believe reasonable adjustments to the current proposal could better balance this proposal's significant industrial scope with the protection of important environmental resources and wildlife connectivity.

Given the extensive regional natural resources required for the project's proposed data center, gas fired power generation, and battery storage use, more robust mitigation measures are appropriate and necessary.

The application and its conceptual site plan do not adequately respond to the following site parameters:

1. Shared boundary with IFNM;
2. Two regionally-important wildlife linkages;
3. Siting of any future solar energy source(s) used.

1. Shared boundary with IFNM

Much of the project's southeast property boundary is directly contiguous to Bureau of Land Management (BLM) and Arizona State Trust Land within IFNM. The project also proposes to develop both sides of Sasco Road, a popular gateway into IFNM.

This project has the potential for significant, permanent impact on IFNM — with negative effects expected on viewsheds, cultural resources, scenic desert landscapes, natural habitats and wildlife populations, recreation experiences and access (including for those that enjoy overlanding and camping on public lands, as well as sportsmen and women that hunt desert bighorn sheep and other species), and dark sky tourism opportunities.

IFNM is an increasingly popular recreation and tourism destination for Pinal and Pima counties, with annual visitation exceeding 125,000 visitors — an increase of more than 400% since 2016. The Town of Marana, a neighbor to Pinal County, passed a resolution in 2025 that opposed any reduction to IFNM's boundaries and recognized the monument's significance to the town's outdoor recreation industry.

Directly south of Sasco Road and the project is the **Los Robles Archaeological District**, which is listed on the National Register of Historic Places and incorporated in IFNM. This 13,000-acre area includes over 100 documented prehistoric sites of the **Hohokam** and other cultures, with features such as the Cerro Prieto "trincheras," or stone terraces, and a significant concentration of petroglyphs within the district's northern end in Pinal County. **The development of a significant industrial project within less than a half-mile radius of significant cultural resources, without any mitigation or setback outside of a single 50' vegetative buffer, is alarming.**

Given the project's immediate adjacency to a national monument, overlap with mapped wildlife linkage areas, and the scale and intensity of the proposed continuous industrial operations, meaningful open space setbacks and buffering must be considered essential components of the project's design. **The current proposal provides little meaningful separation between large-scale industrial uses and Ironwood Forest National Monument.**

The application of no setback and a minimal buffer is extremely unusual, particularly in the context of a national monument. A quarter-mile setback from sensitive use areas, as is open space, is becoming industry best practice — the nearby City of Tucson's proposed code amendment on large scale data centers is currently drafted to include such a setback requirement.

CSDP notes that the section details indicating the design for the vegetative buffers (pg. 195; 198 of 394) are generic with **no specific noise or light reduction design features**. During the April 16, 2026, public hearing, the Chairman of Pinal County's Planning and Zoning Commission raised concerns about noise reduction — these **concerns have not been addressed**.

In your own comprehensive plan, IFNM is zoned as “Major Open Space” and “Recreation/Conservation”. We find it of note that the applicant did not include mention of IFNM, the Los Robles Archaeological District, or incorporate features into the project's design that respond to the monument’s regional significance, nor Pinal County’s two zoning designations.

2. Two regionally-important wildlife linkages

The project overlaps with two Arizona Game and Fish Department (AZGFD)-identified wildlife linkage areas: the Ironwood-Picacho Linkage and the Coyote-Ironwood-Tucson Linkage (pg. 239 of 394 in the Staff Report; also in Appendix 1).

These linkages are critical for regional wildlife movement and landscape connectivity, including the iconic desert bighorn sheep, the Sonoran Desert tortoise, and numerous other Sonoran Desert species.

Potential impacts include habitat fragmentation and barriers created during the project’s construction phase, and permanent habitat fragmentation following the construction of buildings and roads, as well as their noise and light impacts. We can expect **long-term impacts to wildlife that may be difficult or impossible to mitigate** if the linkage is not afforded an appropriate setback and vegetative buffer.

The current configuration also risks creating disconnected open space patches that may not function ecologically over time. For example, nearby Arizona State Trust Lands may eventually be sold or developed, increasing long-term fragmentation risks and reducing future wildlife connectivity. As the Ironwood-Picacho Linkage study notes, “We hope this linkage conservation plan will be used to protect an interconnected system of natural space where our native biodiversity can thrive, at minimal cost to other human endeavors.” We urge staff and the Board of Supervisors to **consider each project with a holistic landscape approach to conserving Pinal County’s natural resources**.

3. Location of solar farm or other additional energy sources required

While the project no longer explicitly includes a solar facility, a solar farm remains referenced in the January 2026 Preliminary Drainage Report (pg. 251 of 394 in the Staff Report), and the applicant discussed solar as a potential future energy source during the recent Planning and Zoning Commission meeting. **Utility-scale solar development could substantially impact open space**, including that set aside as part of this application, and wildlife linkages. We urge staff and the Board of Supervisors to clarify whether new solar facilities are anticipated to serve this project and, if so, where they would be sited.

In response to these concerns, we respectfully request that the Board:

1. Add a new stipulation of approval that will provide a setback for Ironwood Forest National Monument:
“Open space perimeter/boundary buffering Ironwood Forest National Monument with .25 miles, or 1,320 feet, will be required.”

This mirrors the language used in the current Stipulation of Approval item no. 13 (pg. 3 of 394 in the Staff Report).

2. Schematic Landscape Plan (pg. 192 of 394 in the Staff Report): Require the applicant to upgrade the existing 150' vegetative buffers to *at least* a 400' setback that includes, *at a minimum*, a 150' vegetative buffer, and require that vegetative buffers are designed to specifically respond to noise and light pollution.
3. Schematic Landscape Plan - Enlargement D (pg. 196 of 394 in the Staff Report): Require the applicant to upgrade the proposed 50' vegetative buffer between the data center building and wildlife linkage to the above standard.
4. Schematic Landscape Plan (pg. 192 of 394 in the Staff Report): Require the applicant to upgrade the proposed 50' vegetative buffer between the data center buildings and Ironwood Forest National Monument to the above standard; a minimum of 150' vegetative buffer with additional setback (as per Item 1, we recommend that this totals 1,320 feet with the vegetative buffer).
5. Conceptual Site Plan Sheet 5 of 10 (pg. 186 of 394 in the Staff Report): Require the applicant to relocate the approximately 300-ft wide area allocated for a wildlife corridor. This space would provide substantially greater ecological function if relocated adjacent to the mapped wildlife linkage area, which is directly east of the furthest east data center warehouse shown on this sheet — squeezed between the data centers, it serves little purpose. Right now, it is sited separately from the mapped wildlife linkage (Appendix 1).
6. Require the applicant to specify the location of any likely future solar projects associated with this application.

As currently proposed, the Coalition for Sonoran Desert Protection and Friends of Ironwood Forest oppose the rezoning application and its conceptual site plan. We respectfully request that the Board require the noted modifications and additional conditions of approval to address the concerns identified above prior to approving any rezoning action.

Finally, we incorporate by reference our August 8, 2025, and October 15, 2025, comment letters regarding the La Osa Project, attached as Appendices 2 and 3.

We are available to discuss these concerns and recommendations.

Sincerely,

Kate Hotten

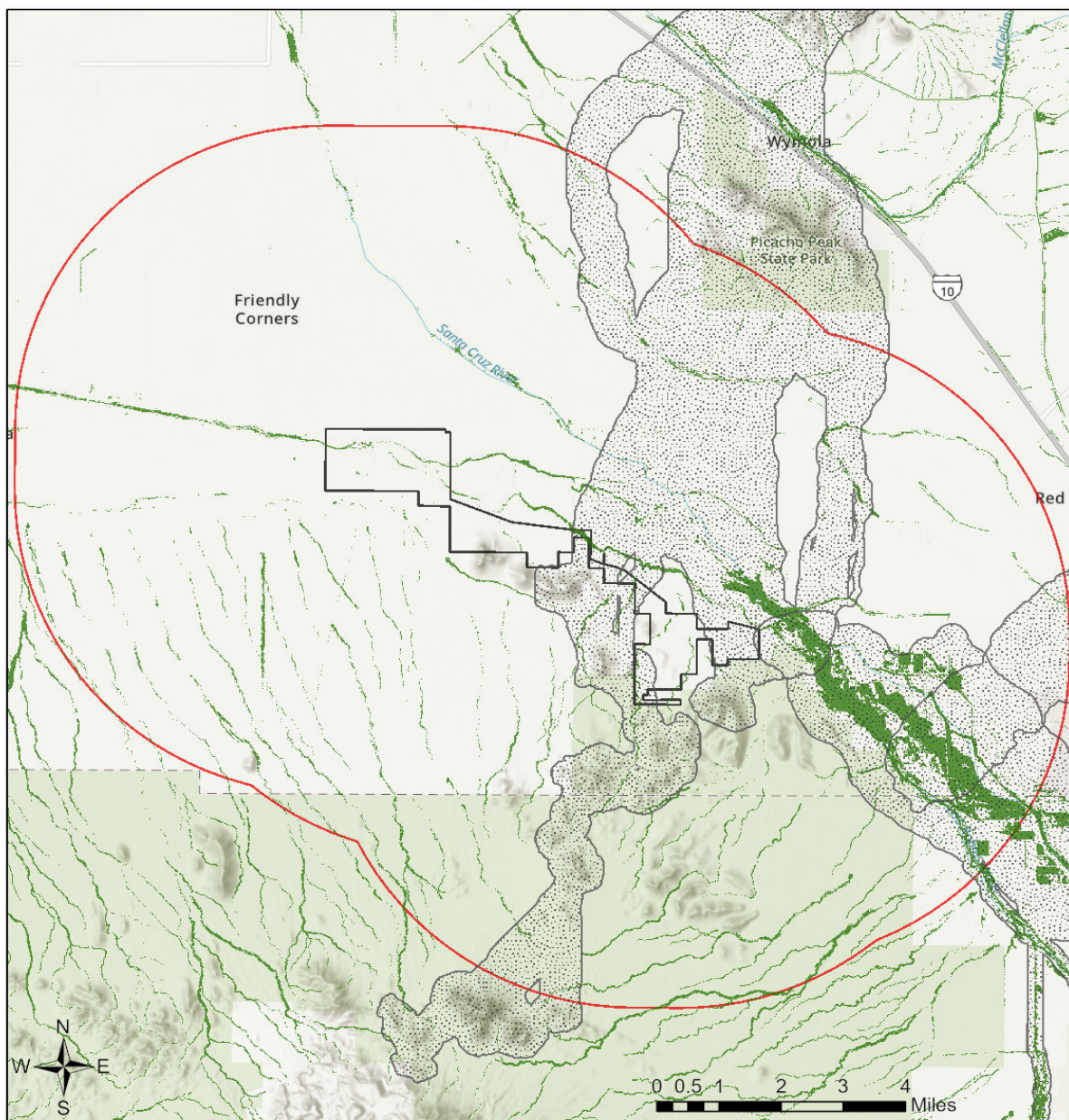
Co-Executive Director, Coalition for Sonoran Desert Protection

Christine Flanagan

President, Friends of Ironwood Forest

CC: Harvey Krauss, Planning Manager, Community Development
Sangeeta Deokar, Planning Supervisor, Community Development

24-0542 La Osa PAD Report Important Areas



- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Wildlife Connectivity

Project Size (acres): 3,466.91
 Lat/Long (DD): 32.5612 / -111.4806
 County(s): Pinal
 AGFD Region(s): Tucson
 Township/Range(s): T10S, R8E; T10S, R9E; T9S, R8E
 USGS Quad(s): FRIENDLY CORNERS; SAMANIEGO HILLS

Esri, NASA, NGA, USGS, CONANP, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS



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](#)



October 15, 2025

ATTN: Pinal County Planning and Zoning Commission
Pinal County Administrative Complex
301 E. 11th ST.
Florence, AZ 85132

RE: Agenda Item 6.B. on PZ-PA-011-25 – La Osa Project

Dear Chair Mennenga and Commissioners,

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. Ironwood Forest National Monument spans Pinal County and Pima County.

Further to our letter dated August 8, 2025, **we are writing to oppose the proposed major comprehensive plan amendment PZ-PA-011-25, or the La Osa Project**, put forward by the developer Vermaland, LLC.

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. In the September 4, 2025, meeting of the Pinal County Citizen Advisory Committee, these points were also raised by a committee member and poorly addressed by the applicant's representative, Court Rich.

We 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. Since its founding 25 years ago, the public lands of IFNM have protected wildlife movement areas and rare desert habitats while providing an important amenity for residents and visitors to Southern Arizona.

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 in Pinal County, the landscape character of which would be permanently and negatively altered by this proposal.

The Arizona Game and Fish Department Project Report clearly notes that the La Osa project overlaps 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 region — resident in Ironwood Forest National Monument and a major attraction for visitors.

Between 2013 and 2016, Arizona Game and Fish Department translocated sheep to restore a herd in the nearby Catalina Mountains. Connecting the two populations is a long-term goal, but desert bighorn sheep movement within, out of, and into the monument would be significantly challenged by this project and its development within several wildlife movement areas. As a result, these iconic sheep populations would suffer.

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. Tourism to nearby Picacho Peak State Park would similarly be impacted.

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

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

Sincerely,

Kate Hotten

Co-Executive Director, Coalition for Sonoran Desert Protection

Christine Flanagan

President, Friends of Ironwood Forest

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Sangeeta Deokar, Planning Supervisor, Community Development