#### Vivian Harte

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August 4, 2025

Mayor Jon Post Town of Marana 11555 W Civic Center Drive Marana, AZ 85653

## RE: Linda Vista 52 Annexation and Rezoning Proposal

Dear Mayor Post,

The Tucson Mountains Association (TMA) is a 501(c)(4) organization founded in 1934 that represents thousands of residents in the Tucson Mountains. Our mission is to preserve open space, protect biodiversity, and promote the well-being of residents in the area.

The area under consideration for the Linda Vista 52 annexation lies within the northern foothills of the Tucson Mountains—an ecologically sensitive and culturally significant landscape that serves as a transition zone between low-density rural neighborhoods and the Avra Valley. This region is defined by its natural character, wildlife corridors, and proximity to cherished public lands including Tucson Mountain Park, Saguaro National Park West, and the Ironwood Forest National Monument. Development decisions here have lasting consequences not only for nearby residents but for the broader integrity of the Sonoran Desert and its role in sustaining tourism, ecological resilience, and quality of life.

TMA opposes the proposed Linda Vista 52 annexation and subsequent rezoning due to the likely adverse impacts on:

- the ecological integrity of the Tucson Mountain foothills,
- groundwater sustainability,
- regional planning consistency,
- and the rural character valued by surrounding residents.

We urge the Town of Marana to reject the annexation or require substantial revisions based on the following points:

# 1. Incompatibility with Surrounding Land Use

 The proposed density—over 450 residential units—represents a sharp contrast with adjacent large-lot rural homes. This leapfrogs urban intensity into a low-density transition zone, undermining regional land use coherence.<sup>1</sup>

## 2. Environmental Sensitivity

- The parcel includes riparian habitat and lies within a broader ecological transition zone between the Tucson Mountains and Tortolitas. It supports species such as the cactus ferruginous pygmy owl and contributes to regional wildlife connectivity. High-density development could permanently fragment these corridors.<sup>2</sup>
- The site also sits on the Tortolita alluvial fan, a landscape shaped by shallow, unpredictable sheet flooding. These hydrologic systems are inherently variable and often lack detailed modeling. High-density development in such areas risks exacerbating flood hazards and altering regional drainage—one reason this part of the foothills has historically seen low-density, Suburban Ranch-zoned development.<sup>3</sup>

### 3. Groundwater and Infrastructure Pressures

- Though the developer claims access to municipal water, the broader aquifer and recharge basin serving rural residents could still be affected.<sup>4</sup>
- Traffic studies assume ideal behavior; rural roads will face long-term cumulative burden.<sup>5</sup>

### 4. Procedural Fairness and Trust

- Perceived conflicts of interest (mayoral recusal due to family ownership) erode public confidence in this proposal.<sup>6</sup>
- Inadequate public notification further suggests that community voices are being sidelined.<sup>7</sup>

## 5. Precedent

• Approving this annexation could set a precedent for future high-density incursions into the Tucson Mountains foothills—an outcome TMA has long worked to prevent.

Please note that TMA is not opposed to all development, but urges a process grounded in:

- regional conservation plans (e.g. the Sonoran Desert Conservation Plan),
- lower-density zoning more consistent with adjacent parcels,
- third-party ecological review before rezoning,
- and expanded community consultation.

We urge the Town of Marana to take these concerns into account, along with those expressed by our partner organizations—including the Living Desert Alliance and the Coalition for Sonoran Desert Protection—all of whom share a commitment to safeguarding the ecological integrity, wildlife corridors, and rural character of the Tucson Mountains region.

Sincerely,

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Vice President (Interim President), Tucson Mountains Association

## **References:**

- 1. Thomas, M. (2025, May 9). <u>Some neighbors with concerns over proposed Marana development</u>. **KGUN 9**. Residents contrast the proposed three-story apartment buildings and cluster housing with large-lot rural holdings (approx. 4 acre properties) zoned Suburban Ranch.
- 2. Thomas, M. (2025, May 9). <u>Some neighbors with concerns over proposed Marana development</u>. **KGUN 9**. Residents describe the property as "an especially important riparian area" and "a pygmy owl habitat, with a high concentration of pygmy owls."
  - <u>Pima County Multi-Species Conservation Plan</u>. (n.d.). *Special Species Management Areas and Critical Land-scape Connections*. Identifies the Tortolita Fan and northwest Tucson Basin as key habitat connectivity zones for the cactus ferruginous pygmy-owl.
  - Cartron, J.-L. E., & Finch, D. M. (Eds.). (2000). <u>Ecology and conservation of the cactus ferruginous pygmy-owl in Arizona</u> (USDA Forest Service Gen. Tech. Rep. RMRS-GTR-43). Forest Service. Notes: "primary threat ... appears to be continued habitat loss due to residential development," in riparian/desert-scrub transition zones.
- 3. Pima County Regional Flood Control District. (2008). <u>Tortolita Fan Watershed Master Plan and Special Study</u> #19. Pima County Regional Flood Control District. Indicates that the Tortolita Fan is active and subject to unpredictable sheet flood and channel migration, with 40% of the watershed in mapped floodplains.
  - Tortolita Alliance. (2025, January 30). *Flood Control & The Fan*. Commentary highlights the inherently unpredictable flood hazards of the Tortolita Fan and the risks posed by development in this area.
  - Pima County. (n.d.). Suburban Ranch Zone (SR) Chapter 18.17. In <u>Pima County Zoning Ordinance</u>. Defines SR zone as intended for low-density, large-lot rural residential uses, contrasting with high-density proposals.
- 4. Thomas, M. (2025, May 9). <u>Some neighbors with concerns over proposed Marana development.</u> KGUN 9. Residents voiced worries about lower water tables and potential strain on the aquifer even as the project is planned to connect to municipal water.
- 5. Thomas, M. (2025, May 9). <u>Some neighbors with concerns over proposed Marana development</u>. KGUN 9; Mahoney, S. (2025, April 25). <u>Marana residents upset about proposed development</u>. KOLD News 13. Developer asserts traffic studies indicate continued acceptable service levels, while residents insist current rural roads cannot sustain cumulative traffic impacts over time.
- 6. Mahoney, S. (2025, April 25). *Marana residents upset about proposed development* KOLD News 13. Mayor recused himself from the annexation vote due to his family's ownership interest in part of the subject property.
- Mahoney, S. (2025, April 25). <u>Marana residents upset about proposed development</u>. KOLD News 13. Residents reported receiving no prior formal notification of the proposed annexation and stated they only became aware of it upon seeing roadside signage.