



MARANA TOWN COUNCIL
STUDY SESSION
NOTICE AND AGENDA
11555 W. Civic Center Drive, Marana, Arizona 85653
Council Chambers, October 8, 2019, at or after 6:00 PM

Ed Honea, Mayor
Jon Post, Vice Mayor
David Bowen, Council Member
Patti Comerford, Council Member
Herb Kai, Council Member
John Officer, Council Member
Roxanne Ziegler, Council Member

Pursuant to A.R.S. § 38-431.02, notice is hereby given to the members of the Marana Town Council and to the general public that the Town Council will hold a meeting open to the public on October 8, 2019, at or after 6:00 PM located in the Council Chambers of the Marana Municipal Complex, 11555 W. Civic Center Drive, Marana, Arizona.

ACTION MAY BE TAKEN BY THE COUNCIL ON ANY ITEM LISTED ON THIS AGENDA. Revisions to the agenda can occur up to 24 hours prior to the meeting. Revised agenda items appear in *italics*.

The Council Chambers are wheelchair and handicapped accessible. Persons with a disability may request a reasonable accommodation, such as a sign language interpreter, by contacting the Town Clerk at (520) 382-1999. Requests should be made as early as possible to arrange the accommodation.

This Notice and Agenda posted no later than 24 hours prior to the meeting at the Marana Municipal Complex, 11555 W. Civic Center Drive, the Marana Operations Center, 5100 W. Ina Road, and at www.maranaaz.gov under Agendas and Minutes.

CALL TO ORDER AND ROLL CALL

PLEDGE OF ALLEGIANCE/INVOCATION/MOMENT OF SILENCE

APPROVAL OF AGENDA

DISCUSSION/DIRECTION/POSSIBLE ACTION

- D1 Relating to the Police Department; Presentation regarding the Marana Police Department's award of full accreditation through the Arizona Association of the Chiefs of Police (AACOP) Arizona Law Enforcement Accreditation Program (ALEAP) (Terry S. Rozema)
- D2 Relating to Development; discussion and direction concerning a proposed draft intergovernmental agreement with the State of Arizona, by and through the Arizona State Land Department, addressing the proposed rezoning of an approximately 8,032-acre area of State Land along the Tangerine Road Corridor and the proposed auction of an approximately 2,766-acre Reconfigured Tortolita Preserve (Frank Cassidy)
- D3 Relating to Development; a presentation and possible direction on comments received in the 60-day statutory review period of the Make Marana 2040 General Plan (Jason Angell)

EXECUTIVE SESSIONS

Pursuant to A.R.S. § 38-431.03, the Town Council may vote to go into executive session, which will not be open to the public, to discuss certain matters.

- E1 Executive Session pursuant to A.R.S. §38-431.03 (A), Council may ask for discussion or consideration, or consultation with designated Town representatives, or consultation for legal advice with the Town Attorney, concerning any matter listed on this agenda for any of the reasons listed in A.R.S. §38-431.03 (A).

FUTURE AGENDA ITEMS

Notwithstanding the mayor's discretion regarding the items to be placed on the agenda, if three or more Council members request that an item be placed on the agenda, it must be placed on the agenda for the second regular Town Council meeting after the date of the request, pursuant to Marana Town Code Section 2-4-2(B).

ADJOURNMENT



Council-Study Session

D1

Meeting Date: 10/08/2019

To: Mayor and Council

Submitted For: Terry Rozema, Police Chief

From: Jennifer Mangialardi, Executive Assistant

Date: October 8, 2019

Strategic Plan Focus Area:
Community

Strategic Plan Focus Area Additional Info:

PRINCIPLE STATEMENT 1: WE WILL MAINTAIN A SAFE AND WELL-MANAGED COMMUNITY.

1. Achieve Accreditation for the Marana Police Department through the Arizona Association of Chiefs of Police State Accreditation Program.

Subject: Relating to the Police Department; Presentation regarding the Marana Police Department's award of full accreditation through the Arizona Association of the Chiefs of Police (AACOP) Arizona Law Enforcement Accreditation Program (ALEAP) (Terry S. Rozema)

Discussion:

The Arizona Association of Chiefs of Police (AACOP) Arizona Law Enforcement Accreditation Program (ALEAP) is intended to provide law enforcement agencies in the state with an avenue for demonstrating that they meet commonly accepted best practices and industry standards for efficient, effective, productive and quality operations. Accreditation status represents a significant professional achievement. Accreditation acknowledges the implementation of policies and procedures that are conceptually sound and operationally effective. Chief Terry Rozema will present to Council regarding the benefits of police accreditation, the process of applying for and obtaining accreditation, the findings following an on-site assessment and hearing, and what accreditation means for the future of the Marana Police Department.

Staff Recommendation:

Presentation Only

Suggested Motion:
Presentation Only

Attachments

ALEAP City Council Presentation



Arizona Law Enforcement Accreditation Program

Chief Terry S. Rozema – Marana, Arizona



What is Accreditation?

The program is designed with consideration for the following goals:

To establish and maintain standards that represent *current professional law enforcement best practices*;

To *increase effectiveness and efficiency* in the delivery of law enforcement services;

To establish standards that address and *reduce liability* for the agency and its members.



What is Accreditation?

A *systematic method* of conducting a detailed internal review of law enforcement agencies policies, procedures, training and operations to ensure they meet the *Best Practices* of the accrediting body.

A *voluntary* program to provide public and professional recognition for those agencies who prove to independent assessors that they meet those standards.



What are the Goals of Accreditation?

- Recognition of *Excellence*.
- To *formalize* essential management procedure for greater accountability.
- To establish *fair and non-discriminatory* personnel practices.
- To *improve* service delivery.
- To improve staff *confidence* in the agency and build community *TRUST* and confidence in the agency.



Benefits of Accreditation

- Objective, outside *stamp of approval* earned through diligent internal and then external evaluation based on the Standards.
- Potential *Decrease* litigation and exposure due to subscribing to Best Practices.
- Continuous *self assessment* of the agency.
- Enhanced *knowledge* of written directives.
- Broaden employee *perspective*.
- *Public confidence*, increased effectiveness, credibility in government.



Why Seek Accreditation ?

Accredited status represents a significant *professional achievement*.

Accreditation acknowledges the *implementation of sound written directives* that are conceptually and operationally effective.

Requires *constant review and updating* of those written directives.



Governing Body

This is a **State of Arizona** Accreditation Program. The program has been implemented by the Arizona Association of Chiefs of Police (AACOP).

The actual Accrediting body will be the Arizona Law Enforcement Accreditation Commission (ALEAC).



Process for Accreditation

The Application Phase

Application, Fee

The Self-Assessment Phase - (Up to 24 months)

Standard Compliance, Directives, Proofs, Mock

The On-site Assessment Phase

Two Assessors, Two days, Verbal, Written Report

The Commission Review/Decision Phase

Award

The Maintaining Compliance and Re-accreditation Phase

Annual Reports



What are the Standards for Accreditation?

Arizona Association Chiefs of Police



Accreditation Standards Manual



Standards for Accreditation

The standards were approved by the *AACOP Executive Board* and any changes in the future will first be heard by the *Accreditation Commission* and recommended to the AACOP Executive Board for final approval..

Based primarily on state and national professional standards, best practices and Arizona statutory and regulatory law.

Agencies must meet *ALL* 174 standards unless they are *N/A* (not applicable), as granted by the Program Manager.





Questions?





Council-Study Session

D2

Meeting Date: 10/08/2019

To: Mayor and Council

From: Frank Cassidy, Town Attorney

Date: October 8, 2019

Strategic Plan Focus Area:
Commerce, Community

Strategic Plan Focus Area Additional Info:

Commerce Principle Statement 2: We will seek and retain diverse industries and commerce.

Goal 1: Implement the 2017 economic development strategic plan.

Community Principle Statement 1: We will maintain a safe and well-managed community.

Goal 5: Implement a financially viable solution for the Tortolita Preserve State Land lease.

Subject: Relating to Development; discussion and direction concerning a proposed draft intergovernmental agreement with the State of Arizona, by and through the Arizona State Land Department, addressing the proposed rezoning of an approximately 8,032-acre area of State Land along the Tangerine Road Corridor and the proposed auction of an approximately 2,766-acre Reconfigured Tortolita Preserve (Frank Cassidy)

Discussion:

The Town of Marana is the lessee of a 99-year lease of the Tortolita Preserve, an approximately 2,400-acre panhandle-shaped area generally bordered on the south by the Moore Road alignment and on the north by the western peninsula of Dove Mountain. The lease ends in the year 2099. The annual lease payment due in October 2019 is \$574,992. Lease payments increase every five years by the higher of 10% or the Consumer Price Index. Consequently, the final year's lease payment will be at least \$2,642,073.

Subject to any new legal requirements implemented in the meantime, when the Tortolita

Preserve lease ends in 2099, the Arizona State Land Department (ASLD) will be able to sell the property at auction to the highest bidder for development.

For many years, the Town has sought to persuade ASLD to auction the Tortolita Preserve, to allow the Town to establish it as a permanent preserve. ASLD is only willing to auction the Tortolita Preserve as an element of the zoning entitlement of other surrounding ASLD holdings located on both sides of Tangerine Road between I-10 and Twin Peaks/Dove Mountain Boulevard. Both of these efforts are consistent with the Town's long-term goals: Implementing a viable financial solution for Tortolita Preserve is a goal of the Town of Marana's Strategic Plan; identifying, preserving, and extending wildlife corridors is a goal of the Town's General Plan; and development of the Tangerine Road Corridor is a goal of the Town of Marana's Economic Development Strategic Plan.

The purpose of tonight's study session is to discuss the proposed terms of an intergovernmental agreement (IGA) that would provide a roadmap for development of the Tangerine Road Corridor and replacement of the Tortolita Preserve lease with a permanently established Reconfigured Tortolita Preserve. Subject to Council's comments and feedback, key elements of the IGA are expected to include:

- Rezoning about 8,032 acres of State Land, including the Tortolita Preserve
 - Imposing open space zoning on about 2,766 acres, including areas bordering Dove Mountain and habitat-rich wildlife corridors -- the "Reconfigured Tortolita Preserve"
 - Granting zoning entitlements on the balance of the property (specifics to be presented in a specific plan to be submitted by ASLD after approval of the IGA)
- Waiving Town of Marana zoning application and review fees
- Bringing forward a development agreement, addressing
 - Formation of one or more community facilities districts or other similar financing methods, to finance the construction of major infrastructure
 - The sequence of development
 - The phasing of public infrastructure improvements needed for development of the property
 - Provisions to identify, construct, and revegetate transportation and utility crossings of the Reconfigured Tortolita Preserve
 - Any necessary and agreed-upon terms governing the Town's application to purchase the Reconfigured Tortolita Preserve
- Post-rezoning auction of the Reconfigured Tortolita Preserve with a minimum bid set at the larger of:
 - The present value of the leased fee interest in the Tortolita Preserve based on scheduled rents under the existing 99-year lease; or
 - The independently appraised value of the Reconfigured Tortolita Preserve (with the assumption that the land is to be used for its highest and best use, taking into consideration the open space restrictions resulting from the ASLD Rezoning), subject to other statutory requirements
- Cancellation of the 99-year Tortolita Preserve lease upon the successful auction of the Reconfigured Tortolita Preserve

As part of its negotiations with ASLD, the Town of Marana commissioned a 2014

appraisal, which determined:

1. The appraised value of the 2,400-acre Tortolita Preserve without open space zoning restrictions: \$17,800,000
2. The present value as of 2014 of the leased fee interest in the Tortolita Preserve based on scheduled rents under the 99-year lease: \$16,530,000

Staff Recommendation:

Council's pleasure.

Suggested Motion:

Council's pleasure.

Attachments

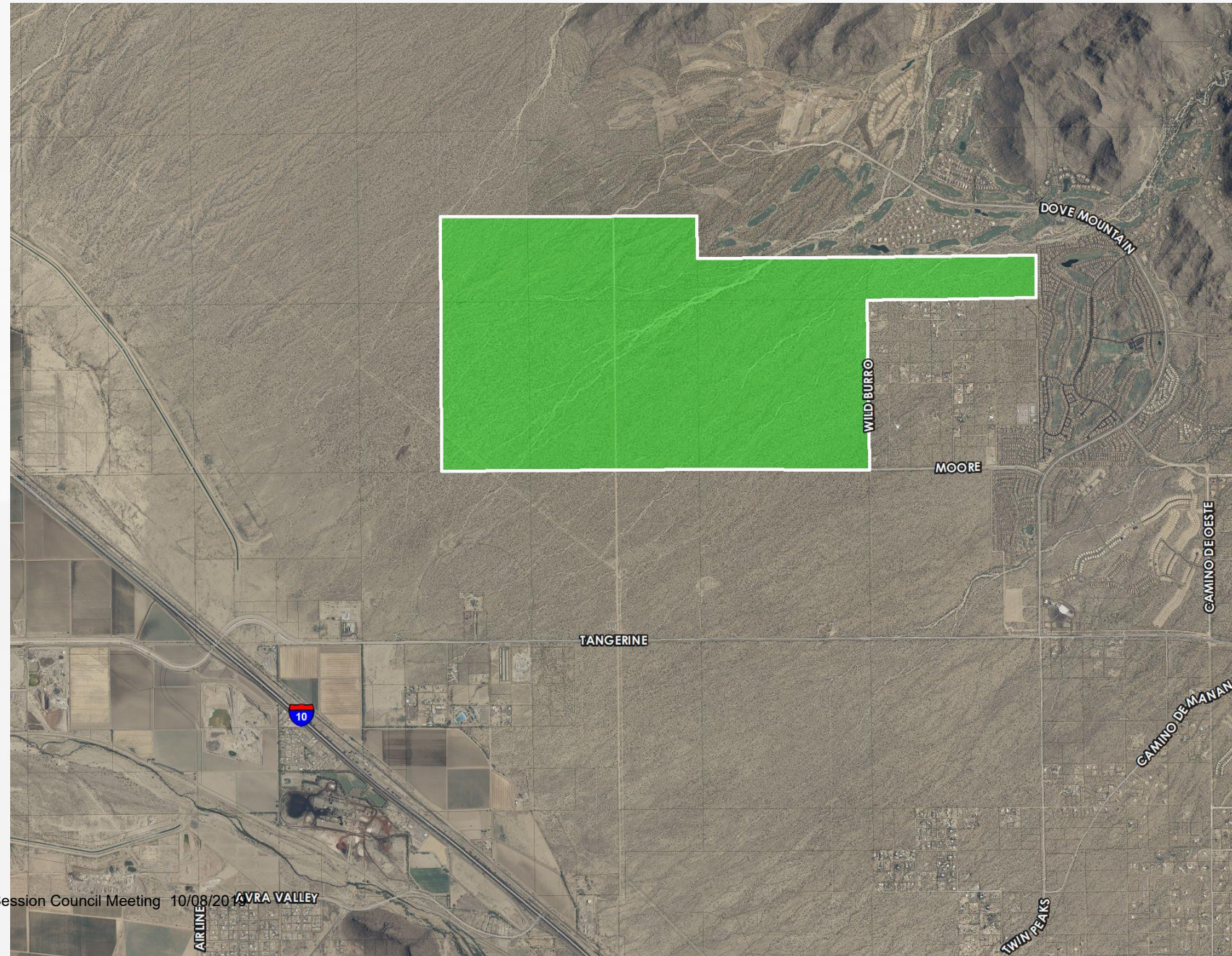
ASLD Tangerine Corridor and Preserve



ASLD Tangerine Corridor Rezoning & Reconfigured Tortolita Preserve

October 8, 2019 Marana Town Council Study Session

Existing Tortolita Preserve lease



- 2,399 acres
- 99 Year Lease
- Began 10/25/2000
- Ends 10/24/2099
- Year 1: \$432,000
- At least 10% increase every 5 yrs
- 2019: \$574,992
- Year 99: At least \$2,642,073



Overview of discussion over the years

- Since 2011: Marana seeks to buy out the Tortolita Preserve lease
- 2016-present: ASLD will only auction the Tortolita Preserve if other surrounding ASLD land benefits from the sale



Town of Marana strategic goals

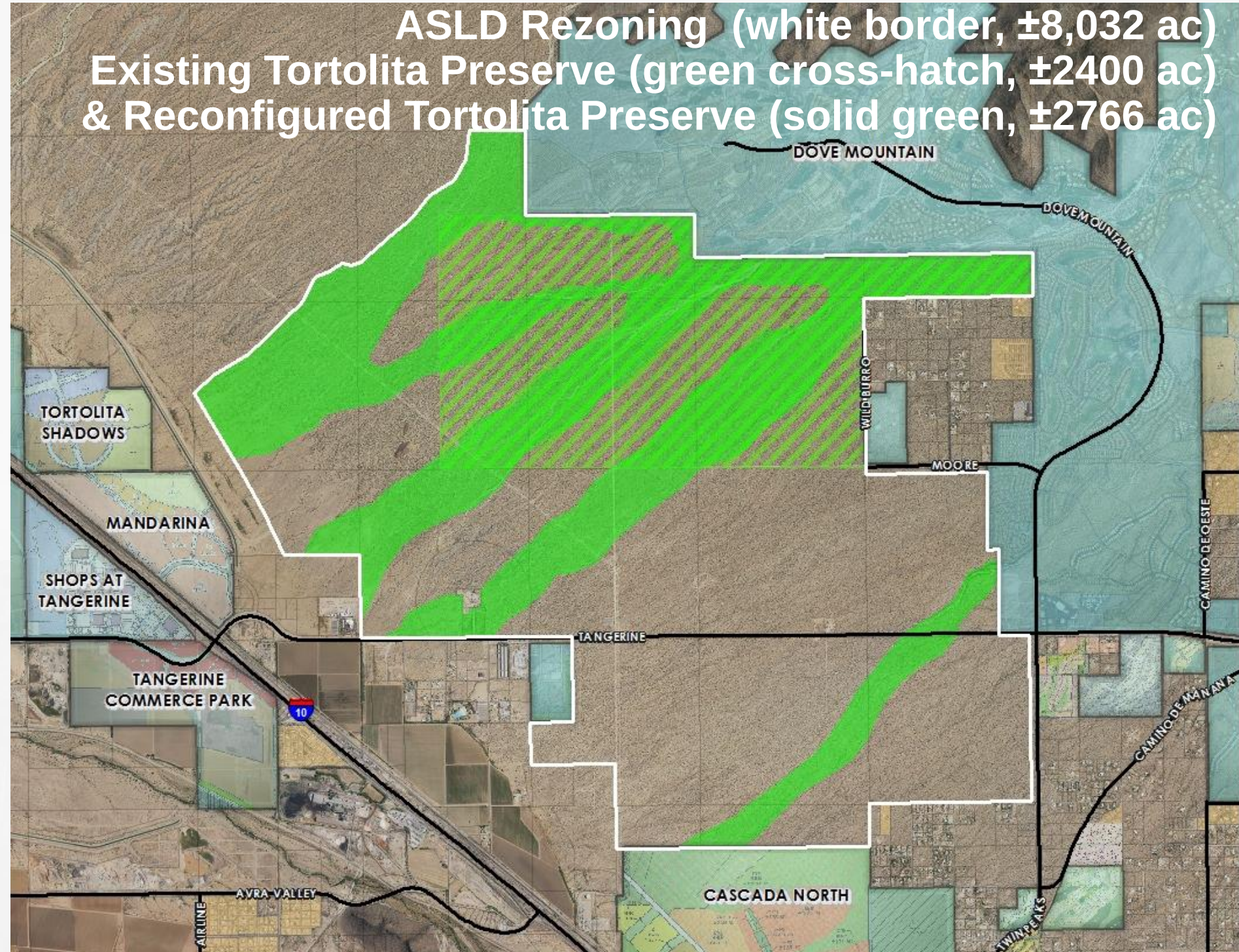
The Town of Marana's strategic goals include:

- Implementing a viable financial solution for Tortolita Preserve
 - Strategic Plan Four, Community Principle Statement 1, Goal 5
- Development of the Tangerine Road Corridor
 - Strategic Plan Four, Commerce Principle Statement 2, Goal 1
 - Economic Development Strategic Plan
- Identify and protect areas with significant wildlife habitat
 - 2010 Marana General Plan Goals, Policies, and Actions, Goal 1.b.

- New IGA
 - Spells out rezoning and auction process
 - Waives rezoning fees
 - Sets the minimum bid for auction of the Reconfigured Tortolita Preserve at the higher of:
 - The fair market value of the Reconfigured Tortolita Preserve
 - The net present value of the leased fee interest in the existing Tortolita Preserve based on scheduled rents under the 99-year lease

- ASLD Tangerine Rezoning
 - ±8,032 acres along the Tangerine Road Corridor from Agricultural (AG) and Zone C – Large Lot Zone to Specific Plan:
 - ±2,766 acres of open space zoning, including areas bordering Dove Mountain and habitat-rich wildlife corridors—the “Reconfigured Tortolita Preserve”
 - Zoning entitlements on the balance of the property—the specifics to be included in the specific plan to be submitted by ASLD after approval of the IGA

- Auction of the Reconfigured Tortolita Preserve
 - Auction occurs after completion of the ASLD Tangerine Rezoning
 - Establishes a permanent Reconfigured Tortolita Preserve with wildlife corridors extending all the way through and to the edges of State Land





Council-Study Session

D3

Meeting Date: 10/08/2019

To: Mayor and Council

From: Jason Angell, Development Services Director

Date: October 8, 2019

Strategic Plan Focus Area:

Commerce, Community, Heritage, Recreation, Progress & Innovation

Subject: Relating to Development; a presentation and possible direction on comments received in the 60-day statutory review period of the Make Marana 2040 General Plan (Jason Angell)

Discussion:

The 60-day statutory review period for the Make Marana 2040 General Plan began on July 29, 2019 and concluded on September 27, 2019. Town staff and Matrix Design Group have worked together to ensure all comments received were recorded in the project comment tracker (copy attached). Staff will present a summary of the comments that have been received to date and discuss possible changes to the Plan prior to public hearings.

Staff Recommendation:

Council's pleasure.

Suggested Motion:

Council's pleasure.

Attachments

GP 60-day Comments



**Southern Arizona
Home Builders
Association**

2840 N. Country Club Rd.
Tucson, AZ 85716
P: 520.795.5114
F: 520.326.8665
www.sahba.org

President

David M. Godlewski

2019 Executive Officers

Chairman

Tim Staring
TRS Custom Builders

1st Vice Chairman

John Ward
Urban Moment

2nd Vice Chairman

Tom Gansheimer
Lennar Homes

Secretary/Treasurer

Ginger Kneup
Bright Future Real Estate
Research, LLC

Immediate Past Chair

Brent Davis
DR Horton

Affiliated With



Marana Study Session Council Meeting of November 2019

SENT VIA ELECTRONIC MAIL

October 2, 2019

Jason Angell
Planning Department
Town of Marana
11555 W. Civic Center Drive
Marana, AZ 85653

RE: Marana 2040 General Plan Comments

Dear Mr. Angell,

Thank you for the opportunity to comment on the Marana 2040 General Plan. SAHBA looks forward to the continued refinement of the General Plan to facilitate the continued growth and economic vitality of Marana.

SAHBA shares the values of job creation, economic development, safe communities, maintaining a high quality of life, etc. discussed throughout the Plan. The critical role housing and homeownership plays in successfully obtaining many of these shared values cannot be overstated. As such, a General Plan which understands and promotes homeownership and housing affordability in Marana will contribute greatly to ensuring many of these community values are indeed realized.

It is imperative the General Plan recognize the role housing will play in the Town's future success but also that the Plan does not unnecessarily add regulatory barriers or increased costs.

SAHBA offers the following comments for your consideration:

General Comments:

1. SAHBA believes a diverse, affordable housing stock is a critical component to promoting business expansion and retention as well as recruiting and maintaining a young, educated work force. Policies need added or amended that acknowledge Marana's housing market is price sensitive and the 2040 General Plan should not create additional regulatory constraints or add unnecessary costs that would hinder the Town's ability to provide a diverse, affordable housing stock. We expect this to be considered and further integrated where possible in the final document.

Specific Comments:

2. Goal BE 6-2: Institutional uses, civic uses, public spaces, and open spaces do not need to be centrally located to be walkable. Also, if retail is not easily accessible via other modes (car, transit, etc.) it will not be viable.
3. Goal BE 8: Careful consideration needs to be implemented here as requiring enhanced architectural design, site enhancements, landscape to increase compatibility with adjacent existing or planned land uses can make this type of development cost prohibitive. Request adding "When economically feasible."

Page 2 of 2

4. Policy BE 8-4: This policy should acknowledge the potential for increased cost and not be at the expense of other policies which promote an affordable and diverse housing choice.
5. Policy BE 11-4: Developers and engineers must adhere to the development standards imposed by the town which provide max slope street requirements. Developers and Engineers do their best to limit the grading needed for residential projects.
6. Policy BE 11-5: We support increased flexibility in lot size variations which facilitate ALL forms of community desired open space. What is the intent of limiting it to natural open space?
7. Policy BE 15-6: What statistical proof or analysis does the town use to determine if development growth does not pay its fair share?
8. Policy BE 18-6: Must recognize cost constraints of local housing market. Suggest adding “when economically feasible.”
9. Policy BE 19-4: How is “major developments” defined? Clarification needed if this requirement is intended to impact residential development.
10. Policy BE 21-2: Is redundant to BE 20-5.
11. Goal BE 24: Request adding “When economically feasible” and recognize the role of development community stakeholders in any update process.
12. Policy BE 25-9: Request adding “when economically feasible.”
13. Goal BE 28: Efforts to force, dictate, or impose design requirements and elements that include material quality or quantities will only backfire. Builders study extensively what homebuyers want. Marana homebuyers should be given consumer choice. The Town should acknowledge, respect and encourage market forces for all future Town development.
14. Policy Be 28-3&4: Lack of variety is less from ineffective ‘architectural variation’ requirements and more from size/type variations. We suggest “engaging the building/development community to revisit existing standards” to meet the intent of this policy.
15. The industry supports a mixture of density and lot size but believe the Town should encourage through the General Plan additional lot types such as rear loaded, clusters, zero lot lines, and condos to best ensure diverse housing types. (BE 29-1, BE 29-2, BE 29-3)
16. Energy efficiency is an important issue for our community. Home builders have taken the lead on this issue in Southern Arizona. Homes built today are incredibly energy efficient and most builders already exceed IBC/IECC requirements on their own accord. Offering incentives will best achieve additional energy efficiency. While the market and codes will drive further efficiencies, we believe the Town must complete a cost/benefit analysis to determine specific impacts of any energy regulation it is proposing before any additional requirements are imposed. (RS 14-3, RS14-4)

SAHBA supports Town efforts to provide a diverse, affordable housing stock which will help maintain Marana as a regional leader. A collaborative effort between the Town and industry stakeholders will best ensure many of these policies and goals are accomplished while balancing the diverse and affordable housing needs of the community.

SAHBA is confident many of the policies and goals outlined in the *Marana 2040 General Plan* are reasonable and obtainable. We look forward to assisting the Town in incorporating our recommendations above and in advancing our shared values while creating a healthy, vibrant economy necessary to all our continued success.

Thank you for consideration.



Shawn Cote



CITY OF ELOY

COMMUNITY DEVELOPMENT DEPARTMENT

PLANNING & ZONING ° BUILDING & SAFETY ° CODE COMPLIANCE

ECONOMIC DEVELOPMENT

August 9, 2019

Mr. Jason Angell, Planning Director
Town of Marana
11555 W. Civic Center Drive
Marana, AZ 85653
Re: Marana General Plan Update-60 Day Review Comments

Dear Jason:

The City of Eloy received the draft general plan update link prepared by the Town of Marana on July 29, 2019. On behalf of the City, I am submitting our comments and discussion/questions, presented below (in the order they appear in the draft document) for the Town of Marana's review and careful consideration.

Absence of External Stakeholders on the Town's Advisory Committee or Citizens Forum. Typically, communities that engage in an extensive update such as this will establish an external stakeholder group or include stakeholders within their advisory committees to address issues of mutual interest within and outside the Town. Such committees function to identify and address such issues during the planning process, which typically minimizes the submittal of comments and time needed to resolve outstanding issues at the Planning Commission and/or Town Council and to meet election requirement deadlines at the conclusion of the planning process. It does not appear external stakeholder input has been accommodated within the planning process at this time.

Glossary. Consider locating at the end of the document, rather than the front.

Town Council

Ed Honea, Mayor
Jon Post, Vice Mayor
Dave Bowen
Patti Comerford
Herb Kai
Roxanne Ziegler
John Officer

Town Management

Jamshedd Mehta, Town Manager
Erik Montague, Deputy Town Manager

Angela Wagner-Gabbard
Carol Godtfredsen
Christopher DeYoung
Colleen Frederick
Dale Moe
David Hindman
David Nelson
George Kennedy
Ginny Huffman
Jack Ferguson
Jacelyn Bronson
John Page-Burton

Planning Commission / Advisory Committee

Thomas Schnee, Chairman
Don Duncan, Vice-Chair
Terry Fehrmann
Ronald Hill
Richard Miller
Sharon Tyson
Bryan Schachter

Planning Staff

Jason Angell, Development Services Director
Steve Cheslak, Principal Planner
Cynthia Ross, AICP, Project Manager
Steven Vasquez, Senior Planner

Citizens' Forum

Kathy Officer
Kyle Canty
Linda Crofts
Loyce Pickett
Michael Smantek
Pam Bramlett
Richard (Dick) Fisher
Ron Hill
Sharon Foltz
Stephen Stone
Tom Cox

Northern Expansion of Marana's Planning Area. Upon review of Figure 1-1, we note that the northern boundary of Marana's Planning Area has expanded to the north approximately six miles and encompasses a total of 36 square miles of land. This area has been a part of the City of Eloy Planning Area since 2010. Having the same lands included within the planning area of both communities is not conducive to good planning practice. ***As such, we respectfully request that the Marana boundary be revised to reflect the common boundary that exists between our respective planning areas as shown in the Marana 2010 General Plan. If Marana approves its General Plan Update with this expanded planning area, we will not respect this new boundary and will continue to show our current planning boundary as depicted in our 2010 General Plan.***

If the expanded boundary is retained by Marana, it could pose a major challenge for the Town since it will require significant financial resources to provide adequate services and facilities for this area - without compromising the service levels of existing residents and businesses. The proposed Marana General Plan, if approved, will set the stage for annexation of this large land area. Upon annexation, Marana will be required to provide a plan showing how basic services, such as police protection, fire protection, communications, parks, and street maintenance will be provided within 10 years. This action will likely result in higher costs or diminished service for existing residents. Marana will not only have to hire more personnel, but also purchase additional equipment to maintain the newly annexed area or reduce police and fire response times and other services to existing residents and businesses-neither of which is preferable. At the end of the day, the future residents and employers of this area will only care that their services are adequate and that the area is fiscally sustainable. This outcome is achievable when adjacent communities collaborate and communicate their intentions and provide cost effective expansion of the necessary services to foster a high quality of life.



We also note in this northwest expansion of the Marana Planning Area, the absence of framework/more definitive planning recommendations for several of the elements. These include the mapping for future land use, circulation, bikeways, transit, public services and facilities, public safety, parks and recreation, and open space.

Areas of Focus. On page 2-3, the list of areas of focus is addressed for Annexations, Growth and Cost of Development. It does not appear that extending the Marana Planning Area an additional seven miles to the

northwest (as a precursor to annexation in the future) is strategic and balanced in terms of growth. How does the expansion support encouraging development in proximity to existing or planned infrastructure and services and promoting fiscally sustainable growth? Does equitably assessing and balancing infrastructure and service costs mean that existing levels of service will diminish?

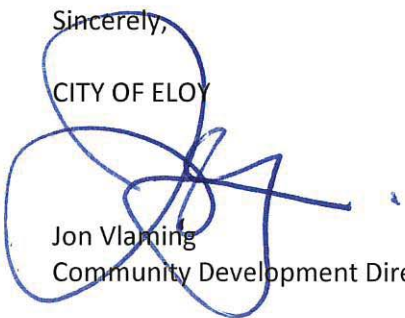
- **Annexations.** Directing annexations in a strategic manner, balancing and managing growth, while promoting economic development.
- **Growth.** Encouraging development in proximity to existing or planned infrastructure and services and managing the growth of the Town in a fiscally sustainable manner.
- **Cost of Development.** Equitably assessing and balancing the costs associated with infrastructure and services to support future growth of the Town.

Military Compatibility Areas. On Figure 2-1, we note the extensive area designated as a Primary Helicopter Training Route MCA. While we respect the intent of preserving mission readiness of the Arizona Army National Guard (AZARNG) to transit rotary aircraft between Silverbell Army Heliport and Picacho Peak Stagefield, we believe the proposed width of the MCA designation area overreaches the needs of the AZARNG. These proposed corridors could be narrowed to protect both the military mission and not diminish the opportunity for future economic development activities and excessive noise generation upon adjacent lands. We look forward to the updated draft version of the Joint Land Use Study to confirm an appropriate corridor width between these two military installations.

On behalf of the City, we appreciate the opportunity to comment on the general plan update during its 60-day review process. We trust Marana will carefully consider our comments in its upcoming Planning Commission public hearings. If you have any questions, or require additional clarification, please do not hesitate to contact me.

Sincerely,

CITY OF ELOY



Jon Vlaming
Community Development Director

Cc: Jamsheed Mehta, Marana Town Manager
Himanshu Patel, Community Development Director, Pinal County
Mayor Joel Belloc and Eloy City Council Members



Town of Oro Valley

September 25, 2019

Cynthia Ross
Town of Marana
11555 W. Civic Center Dr.
Marana, AZ 85653
cross@maranaaz.gov

Re: Marana Draft General Plan Feedback

Dear Ms. Ross,

Please see the Town of Oro Valley's comments regarding Marana's Draft General Plan update below. These comments have also been uploaded on the corresponding website as directed by the Town of Marana.

Overall Comments:

1. The plan includes a variety of aspects and is well laid out. Specifically, the definition differentiating between General Open Space and Natural/Undisturbed Open Space was done well.
2. There is no mention of aquatics/pools. As we understand, Marana's Parks and Recreation Department has had a focus on updating the pool at Ora Mae Harn Park. If that is still a strategic goal it should be included in this plan.
3. Marana has a similar view and track record of street maintenance as Oro Valley; to maintain good road surface conditions. However, it is not clearly stated within this document.
4. The water resource utilization strategy complies with Arizona State Law and therefore our Water Utility has no comments.
5. Marana has several policies and actions related to economic development with regard to collaborating with regional partners (i.e. Sun Corridor, University of Arizona). However, the Town should consider adding partnerships with local jurisdictions to share resources, marketing and tourism, and business intelligence (includes a clearing house for leads and opportunities) to create a stronger regional message and brand.

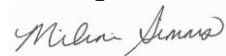
Page Specific Comments:

6. Page 2-22: The Future Circulation Plan
 - a. The figure depicts future roadways deviating from the N-S/E-W urban grid system. Although in the short run, a more efficient design is to follow both terrain and present land development planning today; it will be regionally detrimental in the future. Presently the northern Tucson urban transportation corridors are impacted by the Tortolita Mountain Range. As such, future northward expansion should anticipate the future urbanization and need for multiple north/south corridors. This is presently a problem on the east side of the Tortolitas in Oro Valley. Rancho Vistoso was developed much like this plan depicts, off the corridor grid system with no accommodations for northern corridors. And as such has caused a singular means of north/south connectivity around the east side of the Tortolitas, which is Oracle Road and its overloaded today. Perpetuating this type of design will exacerbate the funneling of all northern Tucson traffic into two existing corridors (I-10 & Oracle Rd.), which is inadequate.

7. Page 2-23: Bicycling and Pedestrian Network
 - a. The introduction paragraph mentions a multi-use lane, bike lane, paved shoulder, and shared use path. However, none of these are listed in the glossary of terms so the reader does not have an understanding of how they are different and when to implement one vs the other. Please consider adding these terms to the glossary.
8. Page 2-24: Bikeways Figure
 - a. Similar to the previous comment, this page makes mention of a striped shoulder bike route. We don't know what them means and what the difference is between this and a bike line or a shared use path.
9. Page 2-26: Transit Figure
 - a. It does not appear that the Sun Shuttle service includes all of the jurisdictional limits of Marana. As a 20 year plan and in conjunction of a possible RTA continuation, we suggest Marana considers future expansion of this service be a goal throughout the entire Town.
10. Page 2-32: Public Services and Facilities Figure
 - a. The legend shows a Senior Center as a public facility. However, on page 2-34 it is referred to as the Marana Community Center. As such, it is unclear if these are the same facilities or two different ones.
11. Page 2-46/47: *Goal BE-20: The transportation system in Marana is properly planned, funded, constructed, and maintained.*
 - a. There is no direct mention of pavement preservation nor was a goal set OCI. This can have an effect on Goal BE-18/Policy BE18-5, as LOS can diminish due to worsening road conditions. More importantly to Oro Valley, lack of maintenance of north/south corridors could push additional traffic on to Oro Valley maintained roads such as La Cholla.
 - b. There is no mention of support for a future continuation of the RTA. The Town of Oro Valley included such support within our latest Strategic Plan. And more support will help the issue progress forward, which will benefit the entire Tucson region.
12. Page 2-49/50: *Goal BE 25-2: Bicycle facilities are planned, designed, and integrated into a connected multi-modal transportation network.*
 - a. The policies mention multi-use path and multipurpose trails. Again, not included in the glossary of terms. The Town suggests Marana better defines and be consistent with path terms and add them to the glossary.
 - b. Specifically, Policy BE 25-5 is to partner regionally for platinum status. There had been discussion of agencies branching off an applying on their own. Just want to be sure Marana is solid with regional partnering.
13. Page 2-50: *Goal BE-26: The bicycle system in Marana is safe, connects areas of community activity, and promotes recreation*
 - a. Policies 26-3 and 26-4 mentions different pathways and paved shoulders. As previously stated, the Town of Marana may want to consider adding these terms to the glossary.

Thank you for the time to review and provide feedback on the Draft General Plan. Again, these comments have also been uploaded to the corresponding website, as requested. If you have any questions about our comments, please feel free to contact me and I will direct you to the appropriate staff member.

Best regards,



Milini Simms
Principal Planner
520.229.4836
msimms@orovalleyaz.gov



September 27, 2019

SENT VIA EMAIL

Jason Angell
Development Services Director
Planning Department
Town of Marana
Marana, AZ 85653

Subject: Make Marana 2040 General Plan Update – Pima County Public Works Comments

Dear Jason:

Thank you for the opportunity to review and comment on the Town of Marana General Plan Update, *Make Marana 2040*. Comments from the Development Services Department and the Office of Sustainability and Conservation are below (Regional Flood Control District submitted comments separately; Regional Wastewater Reclamation Department had no comments):

Administrative Comments

iii: Acre definition = 43,460 SF – should be 43,560 SF

iv: Definition of Conservation should be expanded to include consideration for both natural and *cultural* resources

vii: Invasive species – see comments under Conservation section (p. 4-17)

vii: LID is usually paired with Green Infrastructure

ix: Would Quality of Life also include economic or fiscal functionality?

x: Specific Area Plan: how does this compare to / differ from Master Plan / Specific Plan?

1-2: Long-Range. A general plans provides guidance... should be plan?

2-2: The Transportation Element consolidates the Transportation Element and Bicycling Element... should be Circulation?

2-11 (CIP): This financial plan is a living document and it is contagiously updated... should be continuously?

2-11 (DIF): Water Resource's Development Fee... not possessive?

2-18 (RPZ): ...congregations of people and wildlife. Should be livestock?

2-42: add National Park Service specifically as one of public land agencies? Saguaro NP is the closest Federal land manager to Marana



Built Environment Comments

Downtown Marana: the Land Use Element lists Downtown Marana (p. 2-4), as well as other sections of the plan, with a policy (BE 9-1) to draft and implement a Specific Area Plan for the area. With the exception of showing the location of the municipal complex (Figure 2-9), there is no area shown for where the proposed downtown might be located (it may be difficult to map / plan for atop existing master planned areas).

Airports: Figure 2-3, the 2040 Future Land Use (p. 2-14), shows Runway Protection Zones for SBAH and Marana Regional Airport (MRA) and Approach Restriction Areas for MRA only. Table 2-2, Future Land Use Category Designations lists the Airport (A) designation (p. 2-18) to cover both airports with the Runway Protection Zone and 65 Day-Night Average Sound Level (DNL) overlays – is the latter analogous to the mapped Approach Restriction Area for MRA (and is missing for Pinal Airpark)?

Silverbell Army Heliport (SBAH): The SBAH section (p. 2-5) states that Pinal County is conducting a Joint Land Use Study (JLUS) to protect the base mission and promote compatible land use, planned to be completed by December 2019 – is there a plan to incorporate JLUS recommendations into the general plan? Figure 2-1 (p. 2-7) displays Military Compatibility Areas, with primary and night training areas generally to the northwest. The proposed Traditional Neighborhood land use area southeast of Interstate 10 and Sasco Road in the Northwest Growth Area (Red Rock) would likely be affected by flight operations, especially at night – this may not be an appropriate region in which to promote Traditional Neighborhood land use.

Growth: This section (p. 2-6) states that growth policy, land use planning and capital improvements can guide development to areas suitable for development with existing infrastructure and public services, to encourage organic and natural growth – the central Areas of Activity would be supported by this type of growth. We would argue that many of the Growth Areas, but namely the Northwest and Northeast nodes depicted on Figures 2-1 and 2-2 and those areas along the Santa Cruz River corridor, are unnecessary targets for development, especially for Employment (Figure 2-3). Further, some of this acreage might be classified as “development in remote areas that would require significant infrastructure extensions” (p. 2-6) which the plan seeks to discourage and should not be targeted as Areas of Activity in the MPA as described.

For example, the transportation networks that are planned for the Tortolita Mountain area and near Picacho Peak State Park will disrupt fragile ecosystems and destroy unknown numbers of cultural resources, as well as natural resources. The location of the Marana Mound community along the western flanks of the Tortolitas purportedly covers nearly 56 square miles. Its existence is altogether ignored in this element of the plan, rather, this area is targeted for future Master Planning and the continuation of residential developments. The effects of developing these areas specifically are not discussed in the general plan and the effects of resource loss due to the implementation of past planning in the same fragile areas is not adequately weighed.

We acknowledge areas to address our concerns if best practices are adopted in implementing the policies associated with various land use goals. Extending Policy BE 13-3 and similar planning initiatives to Pima County is preferred.



Additionally, as part of the County's long-standing interest and investment in open space conservation, we have purchased tens of thousands of acres of open space lands across the region and recorded restrictive covenants to ensure their conservation in perpetuity. Many of these Preserves have been identified as potential mitigation under our federally approved Multi-Species Conservation Plan (MSCP) and have been placed under a restrictive covenant that includes heightened restrictions to preserve their high biological value.

The following Preserves appear to fall within the Town's "Growth Areas" as identified in Figure 2-2. We ask that the Town consider the integrity of these Preserves as they plan for future growth in and around these areas:

- "Lower Santa Cruz Replenishment" Preserve Complex: both County-owned parcels (215-04-001V, 215-03-011C) have been placed under the MSCP Restrictive Covenant; these appear to be within Municipal Airport/Southwest Growth Areas;
- Avra Valley - I-10 wildlife corridor; Los Morteros: Most of the parcels in this preserve complex have been placed under the MSCP Restrictive Covenant; these are within Southeast Growth Area
- Cortaro Hartman Preserve: three identified parcels (221-06-0230, 221-06-0240, 221-06-0260) have been placed under the MSCP Restrictive Covenant; these are within the Southeast Growth Area

In addition to the Preserves that have restrictive covenants, the County owns numerous other lands within the Town's MPA that have been set aside for conservation purposes. We ask that Marana also consider these lands when planning for future development in nearby areas and take steps to retain their natural open space character.

Sensitivity to the Natural Environment: We strongly support the Town's intention to "carefully consider and mitigate impacts to the natural environment, including wildlife corridors that connect the Tortolita Mountains with the Saguaro National Park (West), riparian areas along the Santa Cruz River, and other sensitive areas. Improvements roadways to crossing wildlife corridors, including Tangerine Road and a planned extension of Avra Valley Road/Lambert Lane, will need to incorporate grade-separated wildlife crossings and fencing" (p. 2-29; also Figure 2-4, p. 2-22).

We ask that the Town include these same considerations for other transportation system improvements as reflected in Figure 2-4, particularly the Marana Proposed Connector, which would connect the proposed Interstate 11 to I-10. This connector has the potential for significant and detrimental impacts on wildlife connectivity in the area west of I-10, as it will cut across Coyote-Ironwood-Tucson Wildlife Linkage and the Santa Cruz River Riparian/Wash Wildlife Movement Area. It also has the potential to impact other identified wildlife linkages west of proposed connector, including the Brawley Wash Movement Area as well as the Blanco Wash Wildlife Movement Area, which falls just west of the MPA boundary (AGFD 2009-2013).

Policy BE 22-2: When assessing the feasibility of incorporating wildlife crossing structures into roadway design, it is critical that those opportunities are identified as early in the planning process as possible. It can save significant time and money to ensure roadways are designed with this consideration in mind from the outset.



In light of this, we suggest adding the words “as early in the planning process as possible” to the end of this policy statement. We also encourage the Town to consider, as it has for many issues, partnering with Pima County and other regional stakeholders on these efforts as well as efforts to identify funding for the implementation of wildlife crossing infrastructure.

People and Community Comments

Policy PC 27-1: We encourage the Town to develop and adopt a Cultural Resources Master Plan, building upon existing studies and understanding the co-occurrence of nonrenewable cultural resources and areas of high biodiversity.

Policy PC 28-3: We appreciate the intention of this policy and associated goal to protect Marana Mound. In implementing policies proposed in the land use element related to Master Planning and Transportation, Policy PC 28-3 and related environmental policies should be carefully considered first.

Resources and Sustainability Element Comments

General comment: Issues regarding sustainability, climate change mitigation and climate change adaptation are inadequately addressed, not addressed at all, or contradictory to other components of the plan. We argue that these considerations are imperative for promoting community health, economic development and environmental protection.

Open Space Element: We appreciate the Town’s statement that, “New development east of Interstate 10 and north of Tangerine Road, should be sensitively planned and designed to be integrated with the natural environment” (p. 4-3). These considerations should be encouraged for *all* new development, including development west of Interstate 10, especially in light of the numerous identified wildlife linkages that are located west of I-10 as discussed below.

Open Space: Figure 4.1 displays open space in Marana (p. 4-4), to include existing, committed and future trails. Marana’s trail system could provide a more comprehensive and expansive trail network if it includes regional trails (those in the Pima Regional Trail System Master Plan-2015) or trails of national significance (Juan Bautista de Anza National Historic Trail).

Conservation: Invasive Species (p. 4-17) are generally those species that have a propensity to colonize areas, especially post-disturbance, and could be native (creosote bush, desert broom, willow and cottonwood) or non-native (buffel grass, Bermuda grass, tamarisk). A species is most problematic when it is exotic, introduced or non-indigenous *and* invasive. (Also in Definitions, p. vii).

Energy Efficiency: The plan states there is an 80-acre utility-scale solar array on Avra Valley Road (p. 4-18). Any thought about general discussion about areas / zones in Marana where utility-scale solar facilities would be permitted?



Policy RS 2-1: We strongly agree with the Town's intention to "encourage developers to maintain open space, view corridors, and wildlife connectivity in new development to ensure development does not block wildlife crossings and their connecting corridors." As part of this effort, the Town should first ensure that planning and zoning designations in and around identified wildlife linkages are compatible and do not encourage development types and densities that could compromise the functionality of open spaces and wildlife connectivity.

For example, the El Rio Preserve, which the Town considers a "critical connection for wildlife," (p. 4-7) and the Avra Valley - I-10 wildlife corridor (discussed in more detail below) appears to be included within the Southeast Growth Area, as illustrated in Figure 2-2. According to Figure 2-3, future land uses in the area surrounding the preserve include some low density and open space which is generally compatible with wildlife movement, but land uses also include "Employment," which may not be compatible. Planning and zoning designations that consider important natural open space areas and wildlife linkages and allow only compatible development in and adjacent to these areas is the Town's best opportunity to preserve natural open space and maintain wildlife connectivity.

Policy RS 2-2: As part of this policy to "establish guidelines for buffering open spaces from development," the Town should consider guidelines that address indirect impacts to wildlife movement corridors that result from adjacent human activities. For example, nighttime lighting and noise can undermine the functionality of wildlife movement areas by unintentionally discouraging wildlife from using these areas. Measures such as restricting adjacent nighttime lighting from encroaching into natural areas, limiting adjacent business hours to daytime hours to limit nighttime noise, restricting types and locations of fencing to avoid blocking wildlife movement, and locating roads and other ancillary infrastructure for adjacent developments as far away from natural areas as possible can greatly benefit the functionality of wildlife movement areas.

Policy RS 2-3: We are pleased that the Town intends to "coordinate with regional agencies and neighboring jurisdictions to establish and manage open space and incorporate conservation measures into future long-range planning efforts." The County's twenty-year efforts to develop our award-winning Sonoran Desert Conservation Plan (SDCP) produced hundreds of scientific studies and reports on this region's abundant natural resources. We strongly encourage the Town to make use of this work in its own efforts to develop an "Open Space and Wildlife Conservation Master Plan." Specifically, the County's Maeveen Marie Behan Conservation Lands System (CLS), which was developed by the County's Science Technical Advisory Team and serves as a foundation for our federally approved MSCP, identifies the most environmentally sensitive lands within Pima County, including within the Town's boundaries. In addition to the MSCP, the CLS also serves as a foundation for *Pima Prospers*, the County's latest Comprehensive Land Use Plan update, providing us with an effective roadmap for protecting the most environmentally important lands and directing growth into more suitable areas. All of the information related to the SDGP and the CLS is available to the public online and we are happy to provide this information to the Town as a starting point for the Town's efforts.

Policy RS 4-5; Policy RS 10-3: We strongly encourage the Town to develop an ordinance that 1) prohibits property owners from planting invasive, non-native species and 2) requires owners to control invasive, non-native species that may be present on their property.



This is especially important for efforts to control Buffelgrass. The County's Native Plant Preservation Ordinance (*Pima County Code* Chapter 18.72) is a good model for such an ordinance.

Policies RS 11-1, 11-2, 11-3: We applaud the Town's intention to "Develop and adopt an Open Space and Wildlife Conservation Master Plan to establish a vision of open space throughout the Town." We appreciate the inclusion of the County's Sonoran Desert Conservation Plan in the list of documents that provide guidance for the Town's conservation efforts and will inform this master plan. As stated above, we encourage the Town to seek out and use the multitude of studies and reports developed as part of the SDCP.

Policy RS 12-2: In addition to our Native Plant Preservation Ordinance, we encourage the Town to also consider other County ordinances that can serve as models for the Town's efforts to ensure that "Development is integrated and compatible with sensitive Sonoran Desert landscape." These include the Buffer Overlay Zone (Chapter 18.67) and the Hillside Development Overlay Zone (Chapter 18.61).

Policy RS 12-6: We encourage the Town to adopt cluster development standards. Encouraging property owners to cluster developments in the least environmentally-sensitive portion of their project area is an effective way to protect open spaces within developments, and can also be used to encourage the preservation of larger, connected blocks of natural open space areas within developed areas, which are far more functional as wildlife habitat and wildlife linkages than smaller, fragmented patches of open space.

Policy RS 13-1: This policy reflects the Town's intention to identify wildlife habitats and linkages through the development of its "Open Space and Wildlife Conservation Master Plan." However, wildlife linkages within the Town's Municipal Planning Area (MPA) have already been identified through a robust regional assessment undertaken by the Arizona Game and Fish Department (AGFD) and multiple partners, including Pima County.

Information on this effort, including county-level assessments for both Pima and Pinal Counties, can be found on the AGFD website:

<https://www.azgfd.com/wildlife/planning/habitatconnectivity/identifying-corridors/>

Figure 4-3: This figure illustrates only a small number of the wildlife linkages within the Town's MPA. The map below (**Attachment A**) reflects the full suite of wildlife linkages in this area according to the AZGFD information cited above. As the attached map illustrates, there are seven identified wildlife linkages within the Pima County portion of the Town's MPA (several of these linkages continue into Pinal County, which is not reflected on the attached map):

1. Tortolita Mountains Wildlife Movement Area - Landscape (AGFD 2009-2013)
2. Tucson Mountains Ridge to Santa Cruz River/Tortolita Fan Wildlife Movement Area - Landscape (AGFD 2009-2013)
3. Saguaro National Park to Santa Cruz River Wildlife Movement Area - Landscape (AGFD 2009-2013)



4. Coyote-Ironwood-Tucson Wildlife Linkage 2012-2013)
5. Hardy Wash Wildlife Movement Area – Riparian/Wash (2012-2013)
6. Santa Cruz River Wildlife Movement Area – Riparian/Wash (2012-2013)
7. Brawley Wash Wildlife Movement Area – Riparian/Wash (2012-2013)

At a minimum, this existing information should be used as a foundation for the Town's efforts to identify and protect wildlife linkages.

Policy RS 13-5 (El Rio Preserve): The General Plan rightly identifies the 104-acre El Rio Preserve "as a critical connection for wildlife between the Tucson and Tortolita Mountains." (p. 4-7) In fact, this Preserve is located at the confluence of *five* of the seven identified wildlife linkages within the Town's MPA: the Santa Cruz River Riparian/Wash Wildlife Movement Area, the Tortolita Mountains and Saguaro National Park to Santa Cruz River Landscape Wildlife Movement Areas, and the Coyote-Ironwood-Tucson Wildlife Linkage. This preserve is also adjacent to the Avra Valley - I-10 wildlife corridor, a complex of Pima County-owned lands that have been preserved specifically to provide safe passage for wildlife across I-10, one of the region's largest barriers to wildlife movement. This area is considered the best opportunity to provide for wildlife movement across I-10 because of its location and the presence of an existing underpass. The County has invested significant resources in protecting lands on both sides of I-10 as part of our ongoing efforts to create a contiguous corridor of protected lands leading into and out of this underpass. We ask that the Town consider these efforts as it moves forward on developing capital improvements at the El Rio preserve and plans for future development in the surrounding area, and work collaboratively with the County to maintain and improve the ability of wildlife to move through this area.

Thank you again for the opportunity to review the general plan draft – please contact us if you have questions or comments,

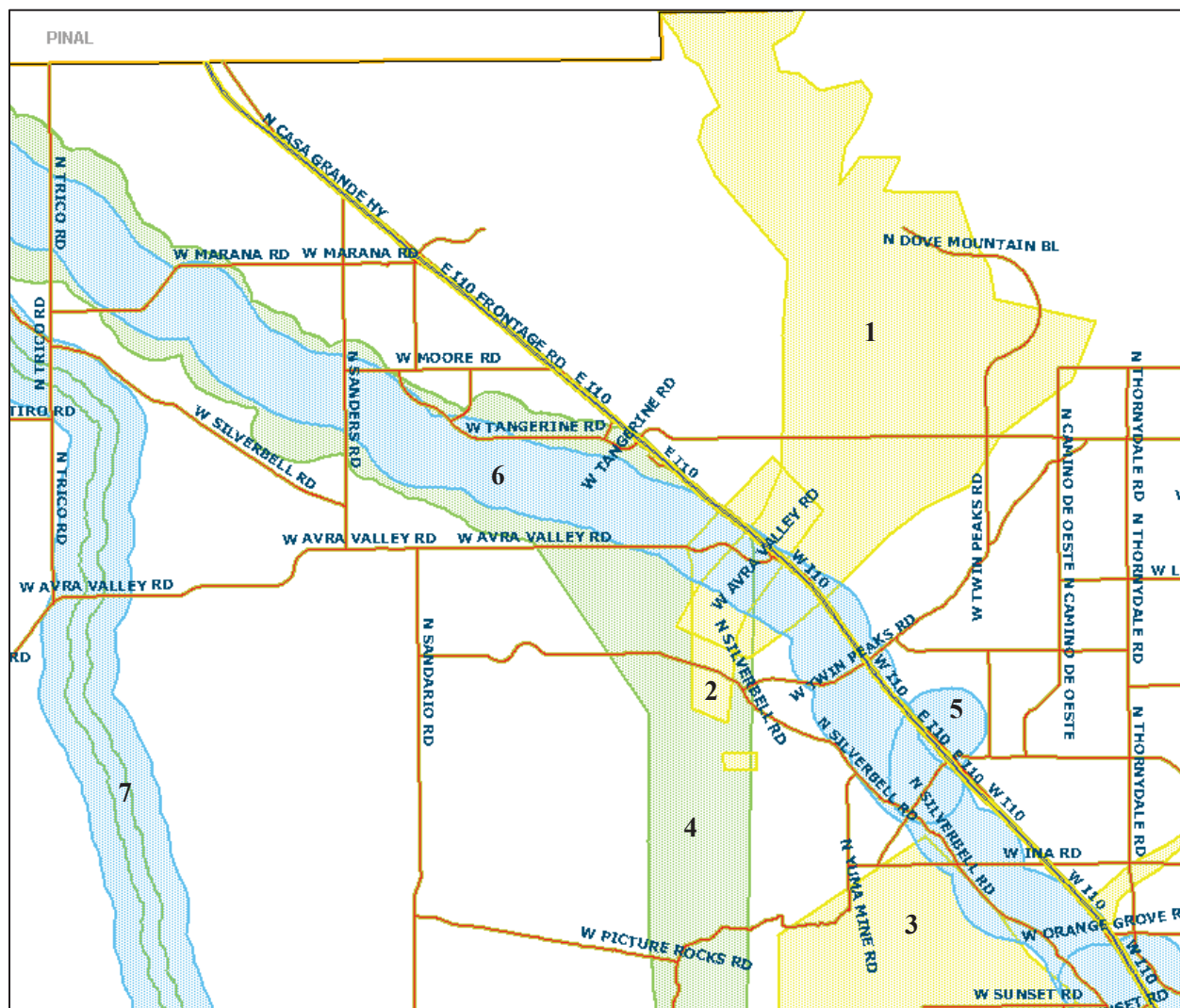
Sincerely,

A handwritten signature in blue ink that reads "Mark Holden". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Holden".

Mark Holden, AICP

Principal Planner

Pima County Development Services Department, Planning Division



1. Tortolita Mountains Wildlife Movement Area - Landscape (AGFD 2009-2013)
2. Tucson Mountains Ridge to Santa Cruz River/Tortolita Fan Wildlife Movement Area - Landscape (AGFD 2009-2013)
3. Saguaro National Park (West) to Santa Cruz River Wildlife Movement Area - Landscape (AGFD 2009-2013)
4. Coyote-Ironwood-Tucson Wildlife Linkage 2012-2013)
5. Hardy Wash Wildlife Movement Area – Riparian/Wash (2012-2013)
6. Santa Cruz River Wildlife Movement Area – Riparian/Wash (2012-2013)
7. Brawley Wash Wildlife Movement Area – Riparian/Wash (2012-2013)



Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 • sonorandesert.org

September 27, 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

Cynthia Ross, Senior Planner
Planning Department
Town of Marana
11555 W. Civic Center Drive
Marana, AZ 85653

Dear Ms. Ross,

Thank you for the opportunity to comment on Marana's Draft General Plan ("General Plan") as we have done with past General Plan proposals.

We would first 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 and management of El Rio Preserve. It is important that all these efforts move forward in an integrated, holistic and simultaneous fashion, which is why we are pleased to see language in the General Plan that combines all these previous efforts into a future Open Space and Wildlife Conservation Plan.

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

The Coalition is generally supportive of the goals included in the General Plan, with a few exceptions. Attached are specific language revisions that we recommend to the Resource and Sustainability Goals and Implementation Actions in the Tables provided by staff. Goals and Actions that we strongly agree with are highlighted in yellow.

Additionally, we feel strongly that resource and conservation actions should be integrated with other General Plan actions, as that is the only avenue to attain conservation in a land use General Plan. As such, we have outlined below our constructive feedback, comments, and recommendations on other Goals and Actions located in sections other than Resource and Sustainability:

1. We strongly disagree with the designation of a Special Planning Area for state trust lands. These lands are currently designated as Low Density, and in the Draft

Habitat Conservation Plan for the Tortolita Fan area, the following language was approved by Mayor and Council as part of the process:

“Limit surface disturbance within developments to 60%. The area addressed by this measure will consist of all lands within the Town that are north of Cortaro Road, south of the Pima/Pinal County Line, east of the CAP canal and an alignment that runs approximately ½-mile east of Interstate-10, and west of the Town’s eastern boundary.”

Again, all three of these proposed Special Planning Areas are currently designated as Low Density. Should there be changes proposed, these parcels should go through the regular two-step (Plan Amendment then Rezoning) process, with public participation, and include land set-asides as laid out in the Draft Habitat Conservation Plan. The Resources and Sustainability Goals in the General Plan need to be reflected in the overall General Plan or they are meaningless.

2. As such, we disagree with the addition of Special Planning Areas in general. Please delete all Goals under BE-12.
3. Table 1-1: Major Plan Amendments signify “significant alterations” to current General Plan categories that are proposed. As such, anything currently designated as Open Space that is proposed for development would be a Major Plan Amendment. Currently, the only category that is considered major is Open Space to Airport (A). Please revise.
4. The Tortolita Preserve needs to be identified on all Town maps. We disagree with the Town’s interpretation of A.R.S. § 9-461.06 that because the preserve is leased, that it cannot be displayed on maps or otherwise referred to as a “preserve.” The General Plan is a 10-year document, and there is an 81-year period left in the lease agreement. If the Town feels that it cannot be labeled “Preserve” due to the “in perpetuity” language, then the land should be delineated and labeled as “Open Space Park.” Please revise.
5. Section 4-14 States:

“Since Marana’s planning area is largely undeveloped there are many opportunities to protect these resources, fostering a healthy ecosystem. Over the years, the Town has completed several documents that are used as guidance but have not been formally adopted due to the delisting of endangered or threatened species and change in federal and state regulations. Some of these documents include the Tres Rios del Norte Feasibility Study (between City of Tucson, Pima County, Marana, and the US Army Corps of Engineers), the Draft Habitat Conservation Plan (Developed for the listing of the Cactus Ferruginous Pygmy Owl), the Santa Cruz River Corridor Study, and the Sonoran Desert Conservation Plan. The Town intends to review these documents and combine these efforts into one Open Space and Wildlife Conservation Plan, which will guide future natural resource conservation in the future.”

The Open Space and Wildlife Conservation Plan should be developed and approved *prior to or simultaneously with* the adoption of the General Plan, in order to better guide future growth. Resource protection and conservation need to be *integrated with* land use plans, not viewed as an unrelated goal or addendum. (See comments above regarding Special Planning Areas.)

6. The General Plan is incorrect in its depiction of the Draft Habitat Conservation Plan. Section 4-15 (again) states in part:

“(T)he Draft Habitat Conservation Plan (Developed for the listing of the Cactus Ferruginous Pygmy Owl).”

However, the Draft Habitat Conservation Plan was developed for 13 species. The Federal Register clearly states this:

“If we approve it, the 25-year permit would authorize the proposed incidental take of 13 covered species, including species currently listed under the Act, as well as species that may become listed under the Act in the future: (1) Lesser long-nosed bat; (2) Southwestern willow flycatcher; (3) Yellow-billed cuckoo; (4) Cactus ferruginous pygmy-owl; (5) Lowland leopard frog; (6) Talus snails; (7) Tucson shovel-nosed snake; (8) Ground snake; (9) Sonoran desert tortoise; (10) Merriam's mouse; (11) Mexican garter snake; (12) Burrowing owl; and (13) Pale Townsend's big-eared bat.” (June 21, 2007)

Please revise the text of the General Plan to reflect this.

7. Wildlife connectivity open space across Tangerine Road needs to be protected *and buffered*. Wildlife crossings have been installed along Tangerine Road at public expense (by the Regional Transportation Authority) and need to function as they are intended. Without adequate buffers, wildlife is unlikely to use the crossings.
8. Prospect Wash wildlife connectivity across Tangerine Road and Moore Road needs to be preserved as NUOS *and buffered*. In addition to Tangerine Road, open space is necessary across Moore Road in order for wildlife movement to continue to the Tortolita Preserve and on to the Tortolita Mountains.
9. Figure 2-X depicts a new interstate, Interstate 11, running west of the Tucson Mountains. Given the current planning timeline for Interstate 11 and the fact that a Preferred Alternative Route has not been chosen, please delete the route and both spurs back to Interstate 10 from your Future Circulation map. The construction of Interstate 11 is well outside of the planning horizon for this General Plan, whether Interstate 11 ends up being built as an I-10 bypass west of the Tucson Mountains or at all.

10. As we have stated before, we disagree with the Lambert Lane extension, which bisects a Regional Wildlife Linkage, the Tortolita-Tucson Mountains Wildlife Linkage. Please delete.
11. As we have stated before, we disagree with a new road (Cayton Road) from Dove Mountain Blvd / Heritage Club Blvd southeast to Thornydale Road. This would disrupt wildlife movement through the Tapestry development across Prospect Wash. Please delete.
12. Marana should respect and adopt the Pinal Open Space and Trails Plan if they annex into Pinal County.
13. On page 2-40-41, we agree with the goals in the Built Environment section, Goals BE 11, Policies BE 11-1 through 11-6, and Goals BE 22, Policies BE 22-1 through BE 22-4.
14. On page 3-7, per the section on the Tangerine Road Corridor, please add an additional bullet that reads:

RTA-funded wildlife crossings will remain undeveloped with at least 300-foot wide NUOS on either side throughout the corridor, and wider through Prospect Wash.
15. On page 3-18, in the last bullet entitled Special Purpose Parks, please add to the end of the last sentence, "such as Tortolita Preserve (or Tortolita Open Space Park)."
16. On page 3-27, under Goal PC-1, please add:

Policy PC 1-5. Ensure that Economic Vitality does not conflict with Resources and Sustainability Goals.
17. While many of the implementation actions listed in the Resources and Sustainability tables, if adopted and followed, will help mitigate the on-going effects of climate change, an action should be added that will "develop and implement a Climate Resilience and Emergency Readiness Plan."

We can support this document with the changes we have recommended, including edits we made to the attached Tables.

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

Sincerely,


Carolyn Campbell
Executive Director

Time Frames Short Term (1-5 Yrs) Mid Term (5-10 Yrs) Long Term (11 + Yrs) On-going

2040 General Plan Goals, Policies, and Actions Review – 60 DAY REVIEW DRAFT		Additional Info
Conservation – Resources & Sustainability		
Goal RS-11. Marana promotes the protection, conservation, and long-term sustainability of its distinct natural environment.		
Policy RS 11-1. Develop and adopt an Open Space and Wildlife Conservation Master Plan to establish a vision of open space throughout the Town.		
Policy RS 11-2. Through an Open Space and Wildlife Conservation Plan, identify open spaces that are development-sensitive or development-free.		
Policy RS 11-3. Seek innovative methods for acquiring and preserving important natural resources.		
Policy RS 11-4. Continue to work with Arizona State Land Department to preserve and adequately buffer major wash corridors throughout Marana.		
Policy RS 11-5. Establish invasive species prevention measures and regulations to continuously monitor, manage, and remove invasive species.		
Policy RS 11-6. Ensure that development has designated collective natural undisturbed open spaces and that they are maintained and managed properly by homeowners’ associations or other entities.		
Policy RS 11-7. Promote habitat creation and species introduction and protection creation at water recharge facilities.		
IMPLEMENTATION ACTION ITEMS		
20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards for to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MID-TERM		
21 Amend the Land Development Code to enable lot size reductions to be granted administratively for a parallel increase in natural open space conservation. MID-TERM		
117 Consider developing and the adoption of wildlife-sensitive development policies. SHORT-TERM		
134 Update hillside development standards in the Land Development Code. MID-TERM		
135 Identify and monitor wildlife and vegetation associated with water recharge facilities. MID-TERM		
Goal RS-12. Development is integrated and compatible with sensitive Sonoran Desert landscape.		
Policy RS 12-1. Work with developers and Coalition for Sonoran Desert Protection and others to conserve natural resources within new developments, including hillsides, wildlife corridors, and native vegetation.		
Policy RS 12-2. Review and assess Land Development Code standards for preservation of natural undisturbed open space.		
Policy RS 12-3. Update the hillside development regulations to limit development impacts on steep slopes.		
Policy RS 12-4. Consider creating land development guidance that recognizes development sensitive areas, such as washes, floodplains, and steep slopes.		
Policy RS 12-5. Explore conservation development strategies that maintain density and permit lot size reductions administratively in exchange for a parallel increase in conserving natural undisturbed open space.		
Policy RS 12-6. Consider adopting cluster development standards in the Land Development Code that permit density bonuses for protecting development sensitive natural resources and open spaces in Marana, using methods such as conservation easements.		
20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards for to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MID-TERM		
21 Amend the Land Development Code to enable lot size reductions to be granted administratively for a parallel increase in natural open space conservation. MID-TERM		
131 Secure funding to minimize the impacts of flooding risk for the areas adjacent to the Santa Cruz River. MID-TERM		
136 Update the Land Development Code to include standards for cluster development, which permit density bonuses for the protection of development sensitive natural resources and open spaces. LONG-TERM		

Commented [CC1]: This should be done prior to the approval of the General Plan so as to be consistent and guide land use planning.

Commented [CC2]: Doesn't Town have this?

Time Frames		Short Term (1-5 Yrs)	Mid Term (5-10 Yrs)	Long Term (11 + Yrs)	On-going
Goal RS-13.	Marana fosters wildlife movement across the community, connecting wildlife to surrounding natural areas.				
	Policy RS 13-1. Through an Open Space and Wildlife Conservation Master Plan, identify wildlife habitats and linkages.				
	Policy RS 13-2. Work with developers and Coalition for Sonoran Desert Protection and others to conserve and incorporate designated natural washes and drainageways within development to accommodate wildlife movement.				
	Policy RS 13-3. Partner with Pima County and other regional stakeholders to seek opportunities for preserving wildlife movement by linking major regional open spaces.				
	Policy RS 13-4. Regularly research best practices for preserving natural undisturbed open spaces to maintain wildlife connectivity, in a manner that is compatible with future growth.				
	Policy RS 13-5. Continue to develop capital improvements at the El Rio Preserve along the Santa Cruz.				
20	Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards for to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MID-TERM				
40	Conduct a feasibility analysis of providing infrastructure to support wildlife crossings in appropriate areas. ON-GOINGLONG-TERM				
41	Develop infrastructure that provides for environmentally sensitive roadway design and construction standards. ON-GOINGLONG-TERM				
117	Consider developing and the adoption of wildlife-sensitive development policies. SHORT-TERM				
118	Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING				
121	Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING				
137	Develop and adopt an Open Space and Wildlife Conservation Master Plan that focuses on open space preservation, wildlife linkages, and wildlife habitats. LONG-TERM				
138	Study the design and feasibility of incorporating wildlife crossings within wildlife corridors when feasible. SHORT-TERM				
139	Continue to pursue community partnerships at the El Rio Preserve along the Santa Cruz to enhance environmental education programs. ON-GOING				

Commented [CC3]: Studies have been done identifying needs through ADOT, ACDFO (2006), Dr. Paul Beier of NACU, and most recently RTA (2012)

Commented [CC4]: Dependent on available funding.

Commented [CC5]: Prior to adoption of General Plan Update

Time Frames Short Term (1-5 Yrs) Mid Term (5-10 Yrs) Long Term (11 + Yrs) On-going

2040 General Plan Goals, Policies, and Actions Review – 60 DAY REVIEW DRAFT		Additional Info
Environmental Planning – Resources & Sustainability		
Goal RS-7. New developments are constructed in a manner that minimizes floods. Policy RS 7-1. Encourage and incentivize the use of Low Impact Development techniques, such as rain water harvesting, as a tool for reducing post-development runoff. Policy RS 7-2. Connect regional active and passive recreational sites along the Santa Cruz River. Policy RS 7-3. Study and seek funding for flood control projects that reduce the extent of the 100-year floodplain in a sustainable manner. Policy RS 7-4. Require developers to pay for drainage facilities within their proposed development. Policy RS 7-5. Seek to obtain grant funding to implement regional drainage facilities.		
IMPLEMENTATION ACTION ITEMS 20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. NEAR-MID-TERM 118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING 121 Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING 127 Implement recommendations of the Northwest Marana Master Drainage Study. ON-GOING 128 Develop low impact design techniques for development within the 100-year floodplain. SHORT-TERM 129 Update the Land Development Code to require low-impact development standards. SHORT-TERM 130 Develop standards in the Land Development Code for detention basin use and location. NO TIME FRAME ASSIGNED		
Goal RS-8. Stormwater is efficiently and sustainably managed in a way that reduces flood risks and respects water quality. Policy RS 8-1. Review, assess, and update the Stormwater Master Plan to comply with Arizona Department of Environmental Quality standards. Policy RS 8-2. Preserve and protect existing primary natural drainage systems. Policy RS 8-3. Consider establishing sustainable stormwater methods, such as green infrastructure and pervious pavements, in new development.		
122 Continue to identify programs for water conservation, including stormwater harvesting. ON-GOING 132 Implement strategies developed in the Northwest Marana Master Drainage Study. MID-TERM		
Goal RS-9. Marana protects its major water corridors from erosion. Policy RS 9-1. Protect the Santa Cruz River from erosion and flooding. Policy RS 9-2. Identify options for expanding bank protection improvements along the north and south bank of the Santa Cruz River.		
97 Update the Santa Cruz Corridor Master Plan. SHORT-TERM 118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING 121 Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING 133 Seek funding for continued bank enhancement and protection measures along the Santa Cruz River to reduce the risks of erosion and flooding. LONG-TERM		

Commented [CC1]: Policies to encourage; codes to regulate

Time Frames		Short Term (1-5 Yrs)	Mid Term (5-10 Yrs)	Long Term (11 + Yrs)	On-going
Goal RS-10.	Marana proactively addresses wildfire hazards in the wildland-urban interface.				
	Policy RS 10-1. Continue to support the implementation of the Pima County Community Wildfire Protection Plan.				
	Policy RS 10-2. Identify wildfire hazard areas in Marana, and adopt associated buffer standards.				
	Policy RS 10-3. Proactively manage wildland vegetation in developed areas to reduce the amount of fire fuels, including Buffelgrass.				
	Policy RS 10-4. Produce and promote fire-safety educational materials for the community.				
	Policy RS 10-5. Encourage ignition-resistant materials and construction techniques.				
118	Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING				
121	Support conservation legislation from other agencies and jurisdictions, such as Pima County, for water quality management, habitat protection, drought planning, erosion management, floodplain management, and hazard management. ON-GOING				

Time Frames Short Term (1-5 Yrs) Mid Term (5-10 Yrs) Long Term (11 + Yrs) On-going

2040 General Plan Goals, Policies, and Actions Review – 60 DAY REVIEW DRAFT		Additional Info
Open Space – Resources & Sustainability		
Goal RS-1. The Santa Cruz River is an iconic open space spine through Marana. Policy RS 1-1. Work with the Pima County Regional Flood Control District to establish the Santa Cruz River as an active and passive open space corridor. Policy RS 1-2. Connect regional active and passive recreational sites along the Santa Cruz River. Policy RS 1-3. Encourage low-impact development standards along the Santa Cruz River Corridor that include habitat protection, flood control, and recreation. Policy RS 1-4. Continue to connect Shared Use Paths along the Santa Cruz River that ultimately achieve connectivity to Downtown Marana. Policy RS 1-5. Evaluate current and future mineral extraction sites for potential reuse once the exaction activities are concluded, such as water detention, wildlife refuge areas, or recreational parks.		
No implementation action items. Need to assign actions.		
Goal RS-2. Marana's dedication to preserving the Sonoran Desert environment contributes to the Town's aesthetic character. Policy RS 2-1. Through the rezoning process, ensure that Where possible, encourage developers to maintain open space, view corridors, and wildlife connectivity in new development to ensure that development does not block wildlife crossings and their connecting corridors. Policy RS 2-2. Establish guidelines for buffering natural open spaces from development. Policy RS 2-3. Where appropriate, coordinate with regional agencies and neighboring jurisdictions to establish and manage open space and incorporate conservation measures into future long-range planning efforts. Policy RS 2-4. Work with the Arizona State Land Department to protect significant open space in the Tortolita Foothills as the area is developed. Policy RS 2-5. Advocate that the efforts of the Arizona State Land Department to preserve high-quality natural undisturbed open space.		
IMPLEMENTATION ACTIONS 20 Amend the Land Development Code and other Town codes and policies to adopt appropriate zoning standards to encourage environmentally sensitive development practices in sensitive areas. Amendments may include transfer of development rights, low-impact development guidelines, and conservation subdivision designs. MID NEAR -TERM 21 Amend the Land Development Code to enable lot size reductions to be granted administratively for a parallel increase in natural open space conservation. NEAR MID -TERM 91 Work with developers of master planned communities to secure recreational facilities, open spaces, linear parks, and/or pathways. ON-GOING 117 Consider developing the adoption of wildlife-sensitive development policies. SHORT-TERM 118 Participate in regularly scheduled coordination and planning workshops or meetings with other jurisdictions and resource management agencies. ON-GOING		

Time Frames		Short Term (1-5 Yrs)	Mid Term (5-10 Yrs)	Long Term (11+ Yrs)	On-going	
Goal RS-3.	Residents enjoy the vast open spaces within and surrounding Marana through an expansive regional trail network and passive recreational opportunities accessible to all community members.					
Policy RS 3-1.	Identify an integrated system of trails through open spaces that connects to Marana’s on-street bike and pedestrian network in the Parks and Recreation Master Plan.					
Policy RS 3-2.	Adopt trail requirements in accordance with the adopted Parks and Recreation Master Plan for future residential developments.					
Policy RS 3-3.	Coordinate with the Bureau of Land Management and National Park Service to connect future trail extensions to current and future trailheads at the Ironwood Forest National Monument and Saguaro National Park.					
Policy RS 3-4.	Coordinate trail extensions with surrounding jurisdictions, including Pima County, Pinal County, the City of Tucson, and the Town of Oro Valley for regional connectivity.					
Policy RS 3-5.	When appropriate, encourage multiuse trails within the erosion hazard setback for natural watercourses.					
Policy RS 3-6.	Adopt design and construction standards for future trails that minimize impacts to the natural environment.					
Policy RS 3-7.	Consider educational kiosks along trails in preserved open space that inform and educate trail users on the Sonoran Desert and other interesting local facts.					
89	Implement recommendations in the 10 Year Town of Marana Parks & Recreation Department Master Plan 2020 – 2030, an update to the Town of Marana Parks and Recreation Master Plan. LONG-TERM					
119	Update the Parks and Recreation Master Plan to include policies and best practices for providing education material related to environmental and conservation issues to the community. SHORT-TERM					
120	Plan future trails with sufficient spacing for wildlife use. LONG-TERM					

Commented [CC1]: What does this mean? The human/public trail itself will be wider so animals can use?

#	Name	Location	Topic	Concerns/Comments
1	Allen Dart	General	NA	<p>Thank you for the opportunity to review the Marana 2040 General Plan Public Draft. My comments are mostly limited to the parts of the plan regarding cultural resources. First, I fully support and appreciate the plan's Goals PC-27, PC-28, and PC-29 and their respective policies regarding preservation, public education, and acknowledging Indian tribes' and nations' concerns about cultural resources. The rest of my comments are on specific parts of the plan.</p> <p>...</p> <p>Thanks again, Allen Dart, RPA, Executive Director Old Pueblo Archaeology Center PO Box 40577 Tucson AZ 85717-0577 USA 520-798-1201 office; call or email for fax adart@oldpueblo.org www.oldpueblo.org</p>
2	Allen Dart	Page 3-20	Arts and Culture	<p>The petroglyphs in the upper photo are not in the Tortolita Mountains, they are in the Tucson Mountains (at the Signal Hill archaeological site in Saguaro National Park West). The text on this page has two errors:</p> <p>(1) It is incorrect to say "Marana and the surrounding region have been settled by . . . the Apache Tribe" because there are multiple Apache tribes in Arizona (San Carlos Apache Tribe, Tonto Apache Tribe of Arizona, White Mountain Apache Tribe, and Yavapai-Apache Nation) and other Apache tribes in other states.</p> <p>(2) It is incorrect that the Hohokam established the first recognizable villages in the area because Las Capas (mentioned on page 3-21) and several other archaeological sites along the Santa Cruz River are pre-Hohokam settlements.</p>
3	Allen Dart	Page 3-21 Las Capas paragraph	Las Capas	<p>Las Capas should be identified as a prehistoric settlement, not just as an archaeological site with an irrigation system (see page 3-20 comment above). The page 3-21 paragraph on Las Capas should say the site is "in the vicinity of" (not "located beneath") the Pima County Reclamation Facility because the site extends well beyond that facility. The irrigation system at Las Capas is the oldest such system currently known not just in the U.S. but in all of North America including Mexico. However, the site's oldest irrigation components are only about 3,600 years old, not 4,000. (Other archaeological features besides the irrigation works at Las Capas have been dated to about 4,000 years old.)</p>
4	Allen Dart	Page 3-21 Wild Burro Canyon Trail paragraph	Technical edit	<p>Replace "cupules" with "bedrock mortars" or "bedrock mortars and cupules." (Southwestern archaeologists usually apply the term "cupule" to a small, round indentation that someone has made in a rock – usually bedrock – perhaps for grinding something but possibly for different purposes such as prophesy; whereas a "mortar" is a bowl-shaped depression in a large stone, in bedrock, or in a wooden or ceramic utensil in which a pestle has been used to pound and grind something. Bedrock mortars in southern Arizona were used historically by Tohono O'odham primarily to pulverize mesquite-tree bean pods into flour that could be used for making gruel or cakes, so probably the mortars along the Wild Burro Canyon Trail [and the ones at Los Morteros, page 3-22] were used similarly by the region's prehistoric peoples.)</p>

5	Allen Dart	Page 3-21 and 22	Photo	The resolution of the page 3-21 "Excavation of the Marana Mound Complex" and page 3-22 "Los Morteros site along the Santa Cruz River" photos is really poor. I can provide better photos at no charge if you're interested.
6	Allen Dart	Page 3-22	Technical edit	In the "Crossroads at Silverbell" paragraph and in the "Preserved remnants" caption, "Bojorquez" should be spelled "Bojórquez" (with an accent mark over the second "o").
7	Allen Dart	Page 3-22 Los Morteros paragraph	Technical edit	Insert "a prehistoric ball court, hundreds of dwellings, petroglyphs, and" before "over 300 bedrock mortars." Also, "Llano del Azotado" probably should read "Puerto del Azotado" as it is identified in most historical sources (e.g., see http://www.anzahistorictrail.org/visit/counties/pima).
8	Allen Dart	Page 3-22 paragraph 3	Technical edit	Delete "the" before "Nogales."
9	Allen Dart	Page 4-5 paragraph 2	Technical edit	The first sentence implies that year-round agriculture dates back 12,000 years ago, which is not true; the 12,000 year figure is not consistent with the 13,000 years of human occupation discussed elsewhere in the plan; and archaeologists don't know when "year-round" agriculture was first practiced in Arizona. Therefore, I suggest revising this first sentence to read: "Historically, the Santa Cruz River supported the early cultures of this area dating back 13,000 years ago and people first practiced agriculture along the river at least 3,600 years ago."
10	Allen Dart	Page 4-9 Saguaro National Park paragraph	Technical edit	The first sentence after the heading should read "The Saguaro National Park's West Unit . . ." (The Park's East Unit is east of Tucson.)
11	Allen Dart	Page 4-9 Coronado National Forest paragraph	Technical edit	It would be correct for the last part of the last sentence to read "east of Marana" instead of "east of Oro Valley."
12	Ken Perry	Page 2-14	FLUM	Thank you for sending out the initial Make Marana 2040 General Plan today. It is very nicely done and informative. I have a couple of comments though. My wife and I attended two of the workshop/neighborhood meetings and heard comments from those in attendance how they would like to have more places to shop, dine, and work in Marana, meaning more nearby commercial uses. I have identified our parcel on the attached exhibit. It is located on the SE corner of Twin Peaks Blvd and Camino De Manana, a future signalized intersection. This would seem to be a good candidate for commercial uses. I am curious as to why it is designated for low density residential, and why in the initial draft of the General Plan there is actually still little overall area planned for commercial in the town. I am also curious as to why the parcels to the east and south of Marana Manana are proposed for "Traditional Neighborhood" which allows for commercial uses. Thank you for your time, Ken
13	Robin Allen	General	NA	After reading this, it absolutely confirmed the comments I have heard about Marana being "an old boy Network." Can't wait to sell. What a mistake it was moving here.
14	Dorenda Coleman	Page 2-5	Technical edit	Comments reads "Western Army National Guard Aviation Training Site." It in reality is Western Army Aviation Training Site, WAATS.

15	William Calame	General	NA	Maybe I missed it in the document (it is lengthy) but I didn't see anything on road noise management/abatement (it is already a problem in dove mountain), or night sky light management. Would like to see some long term goals toward these environmental and live ability concerns and some short term goals, strategies, tactics.
16	Jeffrey Dwhyte	Marana Regional Airport	Marana Regional Airport	Marana Regional Airport - I have read this with interest but I find nothing that speaks to the long term vision for this facility. Is it to remain a private vs. commercial airport? It would anything else would be in conflict with the Pinal Airpark Airport.
17	Jeffrey Dwhyte	Housing	Affordable housing	Lack of comment on affordable housing unless diverse housing is the pc version of that. Recommend using the term affordable housing and lose the architectural speak that is used throughout so people can identify what you are trying to say.(BE 8-4).
18	Jeffrey Dwhyte	Housing / Energy	Solar housing	Why not recommend all new housing be solar efficient with solar tiles on the roof - like they have done in California especially public buildings.
19	Jeffrey Dwhyte	Environmental	Water	Mandate all farms move to pivots / sprinklers and to crops that require less water so as to preserve this resource which will only get harder to source. Cease all open canals and irrigation techniques.
20	Jeffrey Dwhyte	Environmental	Water	Designate plants to allowed that require low water usage.
21	Jeffrey Dwhyte	Transportation	I-11	Spend more time outlining I-11 impact.
22	Jeffrey Dwhyte	Public Safety	Police and fire	My opinion on having fire safety staffing above the national average needs to be balance by cost impact or impact on safety for extra dollars spent. I think the money could be better spent on extra police.
23	Jeffrey Dwhyte	NA	NA	Also as a note I think a goal should be to freeze pensions and move to a 401k/Roth for all city and staff department employees because the DB plans are too expensive to maintain and employees can gain more value in an investment plan.
24	Jeffrey Dwhyte	Neighborhood Preservation	Code enforcement	Enforce bldg codes much of the new construction is not up to the extremes of the desert environment.
25	Jeffrey Dwhyte	Housing / Land Use / Parks and Recreation	Neighborhood parks	Have builders set aside space and develop neighborhood parks.
26	Jeffrey Dwhyte	Transportation	Roadways	Outline new road development with ideas of timelines(notional at least). Determine at the same time the need for some roads to remain open, it seems that there is a movement to turn every farm road into a paved road. Moderate surface residential roads at 35 miles per hour e.g. Moore Rd. traffic can be diverted to Tangerine Rd if they are in a hurry. At 40 mph the speed allowed is 47 mph or better.

27	Jeffrey Dwhyte	Neighborhood Preservation	Setbacks	Examine and establish road proximity allowances to housing and when and where it is less develop sound proofing with trees, berms, walls, etc.
28	Jeffrey Dwhyte	Downtown	Downtown	Lastly, be more definitive on your vision for a downtown while I question the need it seems you are predisposed to this happening so if you must do so with the need for people to live and work in the downtown. Chicago has people living downtown whereas St. Louis does not as an example vibrant vs. dead at night in the downtown core.
29	Michael Davison	General	NA	How about calling the General Plan Make Marana Oro Valley or Make Marana Tucson? I believe the Town of Marana has lost sight of why people live in Marana. Most of us made the decision to live in Marana because it isn't Oro Valley or Tucson. Just because there is open desert doesn't require it to be developed and turned into more tract housing or concrete tilt-up commercial properties. Do not destroy what makes Marana special.
30	Brian Jones	Page 2-13	Open space	While I appreciate the planning for trails and outdoor recreation, I don't think the plan sets aside sufficient space for Open Space. 6.4% is not sufficient. The minimum should be 10%. Also, it is imperative that Marana pass an ordinance to protect its peaks and ridges. The Tucson and Tortolita Mountains add to the character of Marana and are of great value to the community. Development on peaks and ridges damages the viewscape for residents and visitors alike.
31	Brian Jones	Page 4-6	Santa Cruz River	The plan needs to do more to protect the Santa Cruz River corridor and nearby uplands from development, including halting increasing housing density. Not only will this reduce the need for expensive public improvements along this major watercourse, it will provide an essential wildlife corridor and maintain what's left of the character of the river. El Rio Preserve is an important element along the Santa Cruz River and should be expanded and enhanced.
32	Brian Jones	Page 4-14	Tortolita Fan	It doesn't appear that there is sufficient protection of the the Tortolita Fan, both for it's natural, aesthetic and recreational value, but also as a floodprone area. Development should be shifted away from the Tortolita Fan or at least be sparse and low density, with extensive corridors to facilitate wildlife movement and the safe passage of flood waters in a natural floodplain.

33	Robert Ernst	Page 2-33 Potable Water	Water	<p>In this discussion of potable water, the text states that Marana’s buildout population will require 85,420 gpm, a 454 percent increase over the existing capacity of 15,417 gpm. And that enormous increase comes in a state occupying a precarious position regarding allocation of water from the Colorado River, a system that has experienced extensive drought conditions for the last 20 plus years. Water levels in Lake Mead, the primary storage reservoir for the Lower Basin states, and the entire Colorado River System have been rapidly declining and projections indicate that that trend will continue into the foreseeable future. If Lake Mead declines</p> <p>further, planned reductions in deliveries to Arizona agreed to in 2007 will kick in. Where is that potential potable water reduction reflected in the Plan? I couldn’t find it under the Built Environment or the Resources and Sustainability sections. Surely that potential was considered by the planning team when allocating land for future development. Where would concerned citizens find the analysis demonstrating the resilience and sustainability of Marana given potential losses in one of its primary potable water resources?</p>
34	Robert Ernst	Page 4-5 Santa Cruz River	Santa Cruz River	<p>The second paragraph, fourth sentence lists two factors limiting the flow of surface waters but only one is discussed. Why is “excessive ground water pumping” ignored? Isn’t increased ground water pumping a critical element in Marana’s future water use plan? Surely, some discussion is required; otherwise, citizens may think you are trying to hide something unpalatable.</p>
35	Robert Ernst	Page 4-7 El Rio Preserve	Pollinator gardens	<p>Discussing the planting of a single pollinator garden in the Resources and sustainability section reads like a bad play. Is that what’s going to help ensure the long-term survival of pollinator species? Are you kidding? While the Town wants to permit the urban/suburban development of thousands of acres of relatively natural landscapes. Really? And that’s what sustainability means? What about the Town planting pollinator gardens around EVERY municipal building? In every park and open space? Require them in every residential subdivision and commercial center? Come on, either you believe in putting sustainable practices to work on the land or it’s a just a bad joke laughed at by fat cat developers. Or you should just delete that discussion and pretend pollinators do not matter</p>
36	Robert Ernst	Page 4-11 Water Resources Element	Water	<p>In the last sentence, from where would those “additional cost effective water resources” come in an arid environment whose climate is changing? See comment above on p. 2-33.</p>
37	Robert Ernst	Page 4-21 Policy RS 4-2	Water	<p>Why doesn’t the Plan identify best management practices for water conservation programs other than stormwater harvesting? They are well known in the planning and public works communities. This comment can be applied to three or four other policies in the Plan concerning BMPs.</p>

38	Jane Doe	Page 2-28	Technical edit	The US Special Operations Parachute Training and Testing facility should not be called out in this public document. This opens up the facility to vulnerability and frankly, the public doesn't need to know this group is in the area. This would be for their own safety and security.
39	Ellen Shopes	Built Environment Potable Water Page 2-33	Water	While I support continued growth of our community, it can NOT be at the expense of the environment. Groundwater level changes, according to Tucson Water, have continued to drop along the I-10 corridor and Dove Mountain areas. Your own 2010 Potable Water System Master Plan projected a need for "454% increase in water production to met community needs. An additional 47 wells with a capacity of 1500 gpm will be needed to meet these projected needs, assuming that the existing wells maintain current production." But as groundwater levels continue to drop, as needs continue to escalate, this production level is unsustainable. We should consider mechanisms to restore the groundwater level, and limit further depletion. I do not see this concern addressed in the plan.
40	Karen Merodias	Page 2-13 to 2-18	State Land	Very disappointed with the Special plan for The Tangerine State Land. We fear that it'll be rezoned as High Density which does not correspond with surrounding areas and will increase flooding to those of Us South of the Land. High Density will also increase traffic on our residential streets and Thornydale which is only 1 lane each way. There also is not enough water for mass residential area here.
41	Jim Blandin	Transportation	Secondary connection to Dove Mountain	I have reviewed your 2040 General Plan and STRONGLY suggest you make new roads connecting Dove Mountain Blvd and West Moore Rd. to Tangerine Rd a PRIORITY. This will provide alternative ways off the mountain in case of emergency and help relieve some of the traffic caused by the opening of the new CSTEM school on west Moore Rd. Thank you, Jim and Sherry Blandin The Highlands
42	Katie Reffruschinni	State Trust land parcel numbers at Thornydale and Tangerine 219-37-003A 224-12-004C	State Land	This project remains unconstitutional. We have not voted for changing the State Trust Lands water designation. Neither has the Enabling Act of 1910 been modified by Congress. There are NO AMENDMENTS to the Constitution of the United States that allow this Administrative change at the state level. The Arizona State Constitution can not be modified to change the status of these trust lands WITHOUT THE VOTE OF THE PEOPLE. This seizure and modification of State Trust Lands in Title 37, is in VIOLATION OF ARIZONA COURT ORDERS from a previous case involving Prop. 123. The State of Arizona and Governor Ducey were ordered to follow the laws of Arizona and not proceed without the vote of the people. Marana is hereby on notice that they are violating the both constitutions, the citizens of Arizona and democracy.
43	Katie Reffruschinni	State Trust land parcel numbers at Thornydale and Tangerine 219-37-003A 224-12-004C	State Land	https://azcapitoltimes.com/news/2012/09/13/arizona-supreme-court-no-reserved-water-rights-for-state-trust-land/

44	Jacqueline Craig	Resources and Sustainability	State Land	<p>I applaud your intent to create 2 new hiking trails that will connect with the trail network in the Tortolitas. I use these trails extensively and they are very important to me. I also want to emphasize I strongly support fully protecting the Tortolitas from further development and retain the full protection of the areas on Dove Mt called the Preserve, even though the pygmy owl is no more. I would not Marana to become just another town of strip malls and neighborhoods. We need to retain many open spaces in their natural state.</p>
45	The Highlands at Dove Mountain	General	NA	<p>The Board and Management of The Highlands of Dove Mountain applaud the Town of Marana for its initiative in producing a thoughtful, integrated and sustainable plan to steer the growth of Marana. In addition to encouraging our residents to read and comment on your plan, Highlands management would like to take this opportunity to highlight several points of your plan with significant impact on the current and future safety and quality of life of our residents.</p> <p>...</p> <p>Again, congratulations on your initiative and foresight in developing this plan. The Highlands would be happy to answer any questions on our comments.</p>
46	The Highlands at Dove Mountain	Road Network	Secondary connection to Dove Mountain	<p>As development of Dove Mountain continues, its single road Dove Mountain Boulevard has become overwhelmed. In addition to the many accidents that continue to take place at the four-way-stop at Moore and DM Blvd, residents are finding it dangerous to pull out of the north and main gates due to the high volume and fast pace of the traffic which approach is obscured by hills and curves. Now, we also have to deal with the heavy traffic from the new STEM elementary school at the bottom of the hill. There needs to be a secondary egress from the northern area of Dove Mountain and from the school. We note that your plan provides such an egress. We applaud this proposal and endorse the proposed network of connector and arterial roads that will connect the end of DM Blvd to Moore and Tangerine. However, we note that you expect implementation in the midterm of 5-10 years. The need for a connector road both for Dove Mountain and for Moore is far more urgent than that. We urge immediate construction of this road network.</p>
47	The Highlands at Dove Mountain	Resources and Sustainability	State Land	<p>The Highlands notes that the areas to the north and west of the Dove Mountain development are designated "Rural Residential." Our strong hope is that in order to retain the character of Marana's unique desert environment, you successfully negotiate with the Arizona State Land Department to preserve this area as "Open Space." We support retaining large passive natural areas and leaving undisturbed open spaces of ecological significance.</p> <p>The Tortolita Foothills and the two areas called "The Preserve" which border the Dove Mountain development are of special significance to our community, both for recreational purposes and the views they provide that support our property values. We strongly request that in your negotiations with the State of Arizona and Pima County over these areas, you pursue their classification as "Natural Undisturbed Open Space."</p>

48	The Highlands at Dove Mountain	Wildfire Danger	Wildfires	Being directly below the Tortolita Mountains with their dense, dry scrubland and proliferation of non-native grasses, we welcome the plan's focus on wildfire safety. The Highlands has begun the process of enrolling in the federal 'Firewise' program which provides education and assistance in lowering wildfire risk to communities. We were extremely pleased to read of Marana's partnership with Pima County to better protect lands from wildfire threats and look forward to municipal support for our wildfire mitigation efforts, particularly buffelgrass removal.
49	The Highlands at Dove Mountain	Built Environment	Access	The Highlands strongly endorses the following goals: BE 18-3 (Locate ingress/egress points to maximize the use and effectiveness of the existing and planned transportation network) BE 20-1 (Develop and adopt a safe and connected roadway system ... that prioritizes near-term mobility and safety needs)
50	The Highlands at Dove Mountain	Resources and Sustainability	Conservation	The Highlands strongly endorses the following goals: RS 2-4 (to work with Arizona State Land Department to protect significant open space in the Tortolita Foothills) RS 2-5 (to advocate with the Arizona State Land Department to preserve high quality natural undisturbed open space) RS 10-3 (Proactively manage woodland vegetation in developed areas to reduce fuel, including Buffelgrass) RS 11-1 (Develop and adapt Open Space & Wildlife Conservation Master Plan) RS 11-2 (Identify Open Spaces that are development sensitive) RS 11-5 (Prevent and remove invasive species, including Buffelgrass)
51	Harry Tripp	page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2-15; page 2-18	State Land	I oppose creation of a new land use category called SPA, Special Planning Area (pp. 2-15 and 2-18), its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3), and the concept of making any changes to it a "minor" change in the General Plan (Table 1-1). Instead, I support retention of the land use categories for remaining State Trust Land implied by Fig. 5.1.D of the 2010 General Plan.
52	Harry Tripp	Page numbers page 4-10 Table 4-1; page 3-17 Figure 3-2; page 2-14 Figure 2-3	State Land	Table 4-1 indicates that the 9.7 mile Tortolita Preserve Trail will be retained. However, Tortolita Preserve is not shown in Figure 3-2, Parks and Recreation. Further, the region of the Tortolita Preserve is shown as being assigned a land use category of Special Planning Area, where any mix of commercial and residential land use would be permitted. I have previously commented that I oppose the creation and use of "Special Planning Area" in its entirety. With this comment I am opposing the apparent elimination of the Tortolita Preserve and favor its retention as Parks/Open Space, as it was in Fig. 5.1.D of the 2010 General Plan.
53	Frank Osborne	page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2-15; page 2-18	State Land	I oppose creation of a new land use category called SPA, Special Planning Area (pp. 2-15 and 2-18), its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3), and the concept of making any changes to it a "minor" change in the General Plan (Table 1-1). Instead, I support retention of the land use categories for remaining State Trust Land implied by Fig. 5.1.D of the 2010 General Plan.

54	Linda Penwarden	page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2-15; page 2-18	State Land	I oppose creation of a new land use category called SPA, Special Planning Area (pp. 2-15 and 2-18), its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3), and the concept of making any changes to it a "minor" change in the General Plan (Table 1-1). Instead, I support retention of the land use categories for remaining State Trust Land implied by Fig. 5.1.D of the 2010 General Plan.
55	Ted Graydon	Land Use	State Land	I live two blocks south of the State Land that will be annexed by Marana or Oro Valley and my area is zoned for 3.3 acre minimum lot size which is why I purchased land and built here. i want to live with like minded folks and so far I do.
56	Ted Graydon	page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2-15; page 2-18	State Land	I oppose creation of a new land use category called SPA, Special Planning Area (pp. 2-15 and 2-18), its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3), and the concept of making any changes to it a "minor" change in the General Plan (Table 1-1). Instead, I support retention of the land use categories for remaining State Trust Land implied by Fig. 5.1.D of the 2010 General Plan.
57	Judy Graydon	page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2-15; page 2-18	State Land	The property directly south of the 885 acre State Land is zoned SR where I built my retirement home to live amongst like minded people. We purchased our 3.3 acres in 1997 and were told by Pima County Planning that the zoning would not change. The 885 acres is zoned the same as ours and should remain that way perhaps with a swath of commercial zoning directly along Tangerine. I oppose creation of a new land use category called SPA, Special Planning Area (pp. 2-15 and 2-18), its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3), and the concept of making any changes to it a "minor" change in the General Plan (Table 1-1). Instead, I support retention of the land use categories for remaining State Trust Land implied by Fig. 5.1.D of the 2010 General Plan.
58	Diana Campbell	Page 2-8, "Figure 2-2" Growth Area; Page 2.9	State Land	This page and "figure" shows the Tangerine State Land in the Southeast Growth Area, and comments on page 2.9 states "a significant area of activity" is anticipated in the TSL and shows this Land Use Category to be re-zoned as SPA. I oppose and object to Zoning Category SPA, and oppose and object to zoning which would allow a significant area of activity. I insist the Marana be consistent with the TSL's current R1-144 Suburban Ranch zoning and designate the parcel "Rural Residential" (RR) for purposes of the plan. This would stay consistent with current surrounding properties, protect our property values and keep our rural living which is why we all moved to this area.
59	Diana Campbell	Page 2-13, Table 2-1; Page 2-14 Figure 2-3; Page 2-15, 2-16, 2-17 and 2-18	State Land	I oppose and object to creation of a new land use category for the TSL called SPA (Special Planning Area) pages 2-15 through 2-18 as well as the idea of making any changes would be classed as a "minor" change in the General Plan (Table 1-1) with ideas that it could easily be developed as a future Master Plan Area. I support retention of the land use categories for remaining State Trust Land shown in Figure 5.1.D of the 2010 General Plan; Keeping RR (Rural Residential) for low density rural uses, as it currently is.

60	Paul Fish	Arts and Culture	Marana Platform Mound Site	The absence of concern for Marana's important archaeological remains, particularly those related to the Marana Platform Mound Site located a short distance northeast of the current town center, was alarming to me. Previous iterations of the Marana plan have given recognition to these significant resources and no mention at all is given to them in the current version. In fact, now the Marana Mound Site appears to an area cited for residential development and new road construction. Just two miles north of today's Marana city center by way of background, one of the largest prehistoric towns in southern Arizona is still well preserved in its entirety and its remains represent one of the most important archaeological sites in Arizona. Unlike most comparable Hohokam settlements, the surface of the Marana Mound site has never been plowed for agriculture or disturbed in any other comprehensive manner. Public buildings in the form of an earthen platform mound and other community structures are present at the site's center. An estimated population of 800 to 1200 at AD 1250 lived in about 40 surrounding compounds, each enclosing 10 to 20 adobe rooms inside its own wall. In recognition of its unique state of preservation, the Pima County Sonoran Desert Conservation Plan identifies the Marana Mound site as a high priority for protection. With its ritual architecture and large cemeteries, the site holds special significance to the Arizona O'odham descendants. Also, its substantial and extensive adobe architecture combined with its close proximity to the Marana exit enhances its potential for future public
61	F. Valdes	NA	NA	How about putting an Aldi store here in Marana. With all the retirees living here on a fixed income that would be ideal. I'm sure families would benefit from Aldi savings. It's an ideal move for this town. Vic sent to Jason, who sent it to me to enter as a comment into the website.
62	Richard Kelley	Water Resources	Water	Water availability base on CAP calls for water rationing. Currently any commercial or housing development must consider the projected water reductions/rationing
63	Richard Kelley	Land Use / State Land	State Land	The loss of State Lands that shift to/for development. State lands need to be reserved to allow for animal and plant habitat to thrive
64	Richard Kelley	Traffic / Transportation	Roadways	Conduct Traffic density study before approval of new developments. Example: the new Dove Mountain elementary school created heavy traffic that now must be studied and rectify
65	Richard Kelley	Traffic / Transportation	Roadways	Arizona Pavilions traffic is heavily congested due to IH10 interchange and current rail road traffic! The Contaro road needs to be fixed like the Ina Road and IH10 where traffic flows over rail and on/off ramps are designed to facilitate rather than back up traffic for miles. Great example of a problem to be studied is IH19 south and Ajo road where traffic is backed up to IH 10 for vehicles exiting onto Ajo every evening
66	Richard Kelley	Economic Vitality	Commercial development	City of Marana and Chamber of Commence must advocate the commercial development of business like restaurants east of IH10 using Tangerine and Twin Peaks/ Dove Mountain and Thornydale. Need to advocate to use empty commercial buildings like those at Dove Mountain shopping center

67	Richard Kelley	Transportation	Roadways	Use of current or future road materials that allow extended use instead of being constantly asphalt patched
68	Richard Kelley	Transportation	Roadways	Replace Moore road after being use as alternate route for traffic especially heavy trucks
69	Richard Kelley	Transportation	Roadways	Use of roundabouts versus stop sign or light control at intersections. Requires LEO to focus on those who don't understand the rules of use
70	Richard Kelley	Public Safety	Response times	Higher future development does not consider a greater need for shorter response time for first responders
71	Richard Kelley	page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2-15; page 2-18	State Land	I oppose creation of a new land use category called SPA, Special Planning Area (pp. 2-15 and 2-18), its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3), and the concept of making any changes to it a "minor" change in the General Plan (Table 1-1). Instead, I support retention of the land use categories for remaining State Trust Land implied by Fig. 5
72	Andrew Swarthout	Page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-15; page 2-18	State Land	I strongly oppose the creation of Special Planning Area ("SPA") as defined on pp 2-15 and 2-18, particularly with respect to its application to State Trust Lands (Table 2-1 and Figure 2-3), and the concept of making any changes to these lands to be a "minor" change. These State Trust Lands have unique characteristics; therefore, any changes will not be "minor" in nature. Instead, I strongly support the retention of the current land use categories stipulated in Figure 5.1.D of the 2010 General Plan.
73	Renate Ramirez	Page 2-13, Table 2-1; Page 2-14 Figure 2-3; Page 2-15, 2-17 and 2-18	State Land	I strongly oppose and object to creation of a new land use category for the TSL called SPA (Special Planning Area) pages 2-15 through 2-18 as well as the idea of making any changes would be classed as a "minor" change in the General Plan (Table 1-1) with ideas it could easily be developed as a future Master Plan Area. I support retention of the land use categories for remaining State Trust Land shown in Figure 5.1.D of the 2010 General Plan; keeping RR (Rural Residential) for low density rural uses, as it currently is.
74	Renate Ramirez	Page 2-8, "Figure 2-2" Growth Area; Page 2.9	State Land	This page and "figure" shows the Tangerine State Land in the Southeast Growth Area, and comments on page 2.9 states "a significant area of activity" is anticipated in the TSL and shows this Land Use Category to be re-zoned as SPA. I oppose and object to Zoning Category SPA, and also oppose and object to zoning which would allow a significant area of activity. I insist Marana Town be consistent with the TSL's current R1-144 Suburban Ranch zoning and designate the parcel "Rural Residential" (RR) for purpose of the plan. This would stay consistent with the current surrounding properties, protect our property values and keep our rural area that we all choose to live in.

75	Jane Buckman	State land on Tangerine Rod	State Land	My husband and I moved to the area just south of the State Land on Tangerine Road over thirty six years ago. It is a rural neighborhood with horses, dirt roads, mostly dark sky, quiet and free of traffic. The land in question is a pristine, untouched desert environment with diverse protected animals and plants. And in spite of the fact that we have little water and there are plenty of undeveloped lots and unrented or unsold establishments within areas already zoned for building, we continually to spread out. In our current culture most choose the opportunity to make money by encouraging development rather than protect what it is that makes this earth beautiful. I appeal to anyone who can make a difference to please consider the following; 1. Use the land as a nature park like Tohona Chul or Desert Museum. 2. Or NO to LOW density building, single residences, same as neighboring areas. 3. Commercial limited to roadside on Tangerine, No industrial buildings. 4. Open spaces using natural environment....and large buffer zones for animals to continue to use washes. 5. Roads only open to main roads of Thorneydale and Tangerine, not into adjacent rural neighbors. 6. Low lights, covered or omitted.
76	Ron Hill	General	NA	I took the time to go over the draft plan several times. I found the plan to be very well written and organized. This is one of the best technical documents I have read. The document was easy to read. The general public will have no trouble following the document. I was unable to find any inconsistencies. More than once I thought I had found something just to find it addressed a little further on. My only specific comments are related to the figures in the document:
77	Ron Hill	Table 1-1 on page 1-11	Technical edit	Table 1-1 on page 1-11 needs a legend similar to the one shown on figure 2-3 on page 2-15. The general public probably would not be able to understand the figure without it.
78	Ron Hill	Page 4-7	Technical edit	The El Rio Reserve Plan shown on page 4-7 is very difficult to follow. The font is too small.
79	Ron Hill	General	Implementati on schedule	I have one general comment: The implementation schedule for the short term element seems aggressive given the limited staff Marana has available. I assume some consultant support will be required to get it accomplished in the limited timeframes. All in all, I am very impressed with the document.
80	Terri Young	General	NA	Thank you for the comprehensive review of possibilities for Marana for the future. I am concerned about 3 things:
81	Terri Young	Water Resources	Water	1. Responsible growth that accounts for limited water resources. Housing seems to spring up daily on and around Dove Mountain, where I live. Requiring new developments to install water saving devices is essential.
82	Terri Young	Transportation	Secondary connection to Dove Mountain	2. We at the Highlands at Dove Mountain, need egress, not at the end of Marana's expansion, but at the beginning of any development projects, both for safety (traffic flow) and emergency fire exits.

83	Terri Young	Conservation	State Land	3. The area to the W of the Highlands needs to be protected from building and expansion. I understand that most of this is state property; nevertheless, it is habitat for an entire bio-sphere: coyotes, javelinas, lizards, bird, etc., etc. When we have removed all of the wild habitat, we lose our animals and yes, we also lose what makes us human. We lose what makes this area very special.
84	Debra Gordon	Figure 2-3 (on page 2-14) and any other relevant pages	State Land	I object to the inclusion of approximately 885 acres of land owned by the State of Arizona that is located north and south of Tangerine road and bordered on the North, East, West and South, respectively, by Moore Road, Thornydale Road, Shannon Road and Camino del Norte (referred to as the "Tangerine State Land") within Marana's planning boundary. If such parcel continues to be included within Marana's planning boundary, I further object to any land-use designation of the Tangerine State Land that does not align in all material aspects with the land-use designation (i.e., Suburban Ranch) set by the now-controlling jurisdiction (i.e., Pima County). People residing outside Marana receive no formal notice of Marana's actions, rely on land-use planning of the then controlling jurisdiction, and believe those land-use restrictions are meaningful and enforced against everyone - even an abutting municipality. As a result, Marana, insidiously, can push, and has pushed, through "planning designations" on property outside their jurisdiction that adversely affect landowners in adjoining jurisdictions who have had no notice and have relied to their detriment on land-use designations that Marana willfully ignores. The Tangerine State Land has been the subject of decades of objective, science-based conservation planning by Pima County. The parcel is described, among other things, as "lands of high environmental quality" and subject to "multiple layers of conservation designations" (see, e.g., letter, dated December 6, 2017, to Mayor Satish Hiremath and Oro Valley Town Council from Ms. Carolyn Campbell, Director, Coalition
85	Diana Campbell	Page 2-46, Goal BD- State Land 20, Policy BE 20-3; Page 2-47, Policy BE 20-5, Policy BE 20-9	State Land	I oppose and object to Developers and Investors taking private land for any transportation improvements. I oppose and object to the acquisition for right-of-ways through development exactions. If the State Land is to be rezoned and developed, the area is huge, use State Land for roads and right of ways, not take private land from the residents. We bought the property for the rural life and do not want roads going through our property. We don't want transportation infrastructure development encroaching on our current roadways. We don't want through roads entering or exiting the new development into our neighborhood; No access to or from Camino del Norte nor Camino de la Tierra.
86	Diana Campbell	Page 2-47, Goal BE- State Land 21, Policy BE 21-2, Policy BE 21-4	State Land	Strongly oppose and object to the acquisition of private land for right of ways through exactions and development agreements. Use the State Land for the roads necessary in this development. Strongly oppose and object to the idea that new development would provide mitigation for traffic impacts to existing roads; We do not want existing roads (IE Camino del Norte nor Camino de la Tierra) to be considered an avenue for the new development in the Tangerine State Land. Separate roads within the development should be used, without access to Camino del Norte nor Camino de la Tierra; Development roads should be entered and existed on the main roads, ie Tangerine and Thornydale roads only.

87	Diana Campbell	Page 2-48, Policy BE 21-5, Policy BE 21-6, Page 2-49, Policy BE 23-4	Future circulation network	Object and oppose to the idea of future expansion and upgrading of current arterial and/or collector roads rather than constructing new roadway infrastructure. The new development should have it's own transportation infrastructure with access only to Tangerine and Thornydale, and no through streets to Camino del Norte nor Camino de la Tierra. This would cause a horrible increase of traffic into the existing neighborhoods. With 2 schools off of Naranja / La Cholla area, this would ruin or rural neighborhoods with a huge increase in traffic. There should be no access in or out of the development on the Tangerine State Land to the existing neighborhoods.
88	Dennis Campbell	Page 2-8, "Figure 2- State Land 2" Growth Area; Page 2.9		This page shows the TSL in the Southeast Growth Area--on page 2.9 states this area is anticipated as a "significant area of activity" and shows a Land Use Category to be re-zoned as SPA. I oppose to Zoning Category SPA, and object to zoning which would allow a significant area of activity. I insist Marana be consistent with the TSL's current R1-144 Suburban Ranch zoning and designate the parcel as Rural Residential (RR) for purposes of the plan. This would stay consistent with current surrounding properties, protect our property values, and keep our rural living which is why we all moved to this area.
89	Dennis Campbell	Page 2-13, Table 2- State Land 1; Page 2-14 Figure 2-3; Page 2-15, 2-16, 2-17 and 2-18		I oppose and object to creation of a new land use category for the TSL called SPA (Special Planning Area) pages 2-15 through 2-18 as well as the idea of making any changes that would be classed "minor" changes in the General Plan (Table 1-1) with ideas that is could easily be developed into a future Master Plan Area. I support retention of the land use categories for remaining State Trust Land shown in Figure 5.1.D of the 2010 General Plan; keeping RR (Rural Residential) for low density rural uses, as it currently is.
90	Dennis Campbell	Page 2-46, Goal BE- State Land 20, Policy BE 20-3; Page 2-47, Policy BE 20-5, Policy BE 20-9		I oppose and object to Developers and Investors taking private land for any transportation improvements. I oppose to the acquisition for right-of-ways through development exactions. If the State Land is to be rezoned and developed, the area is large enough that this land has room for it's own roads and right of ways, not take private land from the residents. We bought the property for the rural way of life and do not want roads and traffic going through our property and devaluing our home and property. We do not want transportation infrastructure development encroaching our our current rural roadways. We don't want through roads entering or exiting the new development into our neighborhood; No access to or from Camino del Norte nor Camino de la Tierra.

91	Dennis Campbell	Page 2-47, Goal BE- State Land 21, Policy BE 21-2, Policy BE 21-4		I strongly oppose and object to the acquisition of private land for right-of-ways through exactions and development agreements. Use the State Land for the roads necessary in this development. I strongly oppose and object to the idea that new development would provide mitigation for traffic impacts to existing roads; we do not want existing roads (ie Camino del Norte nor Camino de la Tierra) to be considered an avenue for the new development in the Tangerine State Land. Separate roads within the development should be used, without access to Camino del Norte nor Camino de la Tierra; Roads into and out of the new development should only be accessed on the main roads, ie Tangerine and Thornydale roads.
92	Dennis Campbell	Page 2-48, Policy BE 21-5, Policy BE 21-6, Page 2-49, Policy BE 23-4	Future circulation network	I strongly oppose and object to the idea of future expansion and upgrading or current arterial and/or collector roads rather than constructing a new roadway infrastructure for the new development in the Tangerine State Land. The new development should have it's own transportation infrastructure with access only from Tangerine and Thornydale roads, much like the Sky Ranch Development off of Thornydale Road. There should be no through streets from the development to Camino del Norte nor Camino de la Tierra. This would cause a horrific increase in traffic into the existing rural neighborhoods. With 2 schools off of Naranja / La Cholla area, this would ruin our rural neighborhoods. There should be no access in or out of the Tangerine State Land development to the existing south neighborhoods.
93	John Anderson	BE 21-3 & BE 21-4	Traffic	It seems to me that these issues (Re: Traffic reports and new development mitigation for traffic impact on existing roads) should be "Ongoing" rather than in the "Mid-term" column. For instance, the area around Arizona Pavilions and Cortaro is going to be severely impacted by the addition of 600+ new residences in the next few months. There seems to be little or no interest in mitigating the increased traffic, especially on Arizona Pavilions at Cortaro. This will happen other areas and this is why these items need to be on-going.
94	Diana Barnes	Future Land Use Map Figure 2-3, Future Land Use Categories Table 2-1	State Land	The Tortilita Preserve is categorized as in the Special Planning Area. It is then listed under Minor Amendment and can be developed/rezoned by a simple majority vote. The pristine land in northeast Marana needs better protection and oversight.
95	Christie Swarthout	page 1-11, Table 1-1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2-15; page 2-18	State Land	I oppose the creation of a "SPA" category for the following reasons: 1) the Tortolita preserve plan would be jeopardized by granting Marana Carte Blanche to modify the management of these sensitive and unique environments, 2) the State Lands were designated as being part of the preserve due to a) sensitive sheet-flow flood plain dynamics; b) water table fluctuations subject to even low density development and c) pressures on biodiversity as a consequence of these impacts. Respectfully, I do not feel the Town of Marana is qualified to alter the low density plan envisioned by Torolita Plan with such a general mandate envisioned by the "SPA" language to alter zoning densities without more scrutiny. The Thornydale-Tangerine ("TSLD") issue is a crucial example of the broader problem with the "SPA" concept as described in the references cited above. Please feel free to contact me for further input.

96	Michael O'Dell	Land Use	State Land	I think that the land use categories for the Tangerine Corridor and the Tortolita Preserve should be remain as they are now. Increased density will not make Marana more livable and will destroy one of the important reasons that people choose to live here, which is the proximity to the natural desert landscapes.
97	Nick Anderson	Recreation	Recreational opportunities	An urban lake with fishing opportunities in Marana. There use to be fishing in Marana at Anways pond near where is now the Marana vet clinic and at Post pond near what is now the Veterans cemetery also at Humms pond near Wentz and Greer. And the old pay fishing canals that Wong use to have. Can you bring fishing back to Marana?
98	Debra Childers	State Lands / Land Use	State Land	We live in Coyote Estates, which is next to the 302 acre state land parcel. All 17 homes are 3.3 acres or larger. We bought into this area in 2000 because of the rural environment. When Oro Valley wanted to annex the state land and had a Master Plan to add 3000+ homes, commercial, etc, all the surrounding neighbors fought that tooth & nail. The state land is pristine, sensitive Sonoran desert, full of wildlife, riparian areas, majestic saguaros and mature trees. We are responsible to protect and preserve this land. Density should be maintained as a minimum the same as surrounding areas, such as our 3.3 acres/home. Great care should be taken to preserve wildlife corridors and save the existing native plants. Mature trees are very beneficial to the environment, cleaning and cooling the air, retaining moisture, providing homes for wildlife, and increasing property values. We are very interested in seeing Marana's master plans for this land, and will welcome new neighbors, if the plans are sensitive to our environment and supported by the current residents.
99	Debra Gordon	Figure 2-3 on page 2-14 and relevant textual sections	State Land	The Tortolita Preserve is no longer designated in the "2040 Future Land Use" plan. Marana residents and nearby others relied on the longevity of the Tortolita Preserve lease when purchasing homes or otherwise making land-use decisions in the area. Marana should abide its past commitments to its constituents and keep the Tortolita Preserve at least for the full term of the lease (if not permanently). The new "Special Planning Area" designation that covers the current preserve appears to be an underhanded way for Manana and the Arizona State Land Department to create a process leading to relatively easy high-density and commercial rezoning of environmentally-sensitive land under the noses of unsuspecting and/or uninformed landowners.
100	Dr. and Mrs. Ed and Susan Lovejoy	Page 44-45 Tangerine and Thornydale 885 Acres	State Land	We object to designation of the Tangerine State Land as "Special Planning Area," and insist that Marana be consistent with the Tangerine State Land's current R1-144 (Suburban Ranch) zoning and designate the parcel "Rural Residential" for purposes of the Plan. We also insist that Marana apply the Plan amendment processes in Table 1-1 of the proposed Plan to change the Rural Residential designation.

101	Hilary Jones-Wujcik	State Land	State Land	I object to designation of the Tangerine State Land as "Special Planning Area". I insist that Marana be consistent with the Tangerine State Land's current R1-144 (Suburban Ranch) zoning and designate the parcel "Rural Residential" for purposes of the plan and I insist that Marana apply the Plan amendment processes in Table 1-1 of the proposed Plan to change the Rural Residential designation. This is in regards to the Tangerine State Land.
102	Robin Davis	Figure 2-3 on page 2-14	State Land	The town of Marana's proposed 2040 General Plan includes State Trust Land along Tangerine Road. The Plan designates the State Trust Land as a "Special Planning Area." This designation will override the current low-density, residential-only zoning of the State Trust Land, specifically the 885 acres at Tangerine/Thornydale that is included in Marana's planning area. The "Special Planning Area" designation sets the stage to bypass numerous processes that might otherwise help protect the homeowner/neighbor's property rights and give neighbors additional input into future Tangerine State Land land uses and rezoning. The Tangerine State Trust Land is part of the Tortolita Fan. The land been designated as environmentally sensitive lands containing significant vegetation and wildlife. I urge the town to review Pima County's Conservation Plan as it applies to these lands. Carolyn Campbell of the Coalition for Sonoran Desert Protection has been very involved with some of this land and has made recommendations to Oro Valley on the development of the 885 acres (if annexed, now on hold per ASLD). As a homeowner on a 1+ acre lot very near the Tangerine State Trust Land, I strongly OPPOSE the designation of "Special Planning Area" and urge the town of Marana to keep the existing land designations for the Tangerine State Trust Land in order to 1) protect neighboring landowners rights, 2) give neighbors a voice in the development of the land and 3) ensure protection of environmentally sensitive lands in the area.
103	Hilary Jones-Wujcik	Table 1-1	State Land	Vic Hathaway forwarded me this comment. I live in the neighborhood south of the 500 acre state land parcel. I object to designation of the Tangerine State Land as "Special Planning Area". I insist that Marana be consistent with the Tangerine State Land's current R1-144 (Suburban Ranch) zoning and designate the parcel "Rural Residential" for purposes of the plan and I insist that Marana apply the Plan amendment processes in Table 1-1 of the proposed Plan to change the Rural Residential designation. Thank you, Hilary Jones-Wujcik, 3650 W. Sahuaro Divide, Tucson, AZ. 85742

104	Russell Alimena	State Land	State Land	<p>(i) I object to designation of the Tangerine State Land as “Special Planning Area,” (ii) I insist that Marana be consistent with the Tangerine State Land’s current R1-144 (Suburban Ranch) zoning and designate the parcel “Rural Residential” for purposes of the Plan, and (iii) I insist that Marana apply the Plan amendment processes in Table 1-1 of the proposed Plan to change the Rural Residential designation. I also insist that Marana make no changes from the now-effective general plan (adopted in 2010) as it relates to the Tangerine State Land. In that case, the Tangerine State Land is designated Low-Density Residential, which allows higher density development than is currently allowed under Pima County zoning. We are a rural low density community hell bent on keeping it that way. High density building will disrupt every aspect of what rural life is. I know you are looking at dollar signs but we are looking at preserving a way of life. Please be aware that we are willing to look at fair and reasonable development but will not be robbed of our way of life without a fight. Thank you for consideration.</p>
105	Mark Coppola	State Land	State Land	<p>I am opposed to any changes to the General Plan or zoning that would increase the use or density of the Tangerine State Land (TSL) currently being offered for annexation by the Arizona State Land Department. I am also opposed to designating this a "Special Planning Area." Existing R1-144 (Suburban Ranch) or a Rural Residential designation is the only zoning that is compatible with the surrounding neighborhoods. I urge you to listen to your local constituents and their neighbors in regard to this land, and not to out-of town entities. We the people who live here should have a greater voice in what happens to this land. The TSL is currently surrounded by low-density properties whose owners enjoy the rural lifestyle that they selected when they purchased their properties. Dumping high-density housing in the middle of this neighborhood will destroy our quality of life and reduce our property values. The increased traffic, night light, and sheet flooding will be detrimental to surrounding neighbors, in addition to destroying a square mile of pristine, Sonoran desert.</p>
106	Corey Hoen	General	NA	<p>This is a quality long term plan for growth in the community. I realize that not everyone likes growth, but Marana is prime for success. The Town has done a great job managing and planning for growth, which has allowed us to enjoy many amenities. I hear my neighbors always asking for more restaurants, shopping, entertainment, etc. but they don’t always understand that to get all that, we need to grow. This plan does just that. My family STRONGLY supports this plan for long range managed growth.</p>
107	Anthony DiRusso	2-2 Tangerine State Land	State Land	<p>As a long time resident area resident, I 'm very concerned about Marana's intention to annex the Tangerine State Land parcel on N. Thornydale and Tangerine Roads. Any zoning other than low density residential will have, I believe, a negative effect on my property value and , more importantly my quality of life. I truly hope the Town of Marana will consider the impact it's future decisions will have on it's neighbors, and act in a way that will respect the unique desert setting we all cherish. Thank you for your time and consideration.</p>

108	Karen Merodias	2-13 -2-18, 2-6, 2-16, 2-18, 3-7, 3-35	State Land	I had filed comments previously regarding the Annexation and rezoning of the State Land bounded by Tangerine, Thornydale, Camino Norte, Moore Rd Camino de la Tierra. SPA zoning is unacceptable for this area, it is currently Rural and should remain Rural. This is a natural Habitat for many wild creatures and a ironwood forest. Please keep in mind your Goal PC-20. Over developing this area will create increased flooding to the South and displace many creatures.
109	Diana Barnes	Page 1-10	State Land	Hundreds of acres of natural green space including the Tortolita Preserve and the 885 acre as between Oro Valley and Marana should not be classified as MINOR in the SPA, special planning area. This means these lands will have less protection and can be re-zoned quickly by developers and lost forever. Please classify these lands, the Tortolita Preserve and the 885, as MAJOR to better protect them for the children's children of 2040
110	Jill Kismet	Page 2-38 Policy BE 6-3	Open space	I support this policy. As mentioned in the introduction of this document, people chose to live in Marana for the pristine Sonoran desert. Open space preserves are what will support the continuation of Marana as a place that others want to live vs choosing downtown Tucson, or even the Phoenix area. People are specifically coming here for the pristine desert, no other reason.
111	Jill Kismet	Page 3-7	State Land	Tangerine Corridor I strongly disagree with the land use ideas promoted here. Just a short drive down Tangerine Park we have "innovation park" which has largely failed to be the tech nub of south Tucson. If future businesses want to be involved, there is plenty of appropriated land for this vision. Tangerine is high succession desert, impossible to replicate, with high wildlife and plant value. Destroying it for high-density housing, business campuses and hotels is a poor use of the resource that Marana has. Instead, use cotton fields or "spoiled" desert by the outlets or city center to fulfill your dreams. Marana has plenty of trashed desert to use, and YOU are in the position to dictate terms to developers-not the other way around.
112	Jill Kismet	Page 4-15	Conservation	Conservation Element I support this policy. In fact, I think it is imperative that before future development is recommended by this plan that YOU DO merge all the natural resource plans and documents together as your suggested. The habitat value for wildlife, the 200 yr old saguaros in an old growth desert, the fan's protection from flooding are all considerations that don't appear to be a priority to Marana as noted by recent unabated and destructive blading at the corner of Camino Manana and Tangerine. Your paving paradise to put up a parking lot.
113	Jill Kismet	Page 4-19 Policy RS 2-4	Conservation	I support this policy. After you completed in-depth studies from 4-15 and merged conservation plans it will be clear and necessary to suggest that AZ be encouraged to create a preserve in some areas vs selling to private development, particularly in the high quality desert on Tangerine.

114	Jill Kismet	Page 4-24 Policy RS-11 and 12	Conservation	I strongly disagree with these policies as they do not DEFINE actual protections for some of the highest quality desert in AZ, rather they just "evaluate" and provide protections for "washes" which means large swaths will be eliminated to high density housing/business/etc. Marana needs to re-examine why it would support elimination of the only driver of people to this area, it's natural beauty. Marana has significant areas in lowlands that can support high intensity development that you are suggesting.
115	Jill Kismet	Land Use / Conservation	State Land	In conclusion, the plan is vast and has dreamy far-reaching goals- that's fantastic and inspiring. However, I don't support any rezoning on Tangerine where pristine desert exists-let's stick to the old plan. Its future development should remain low density as it was originally zoned for-we will vote it out of the plan as citizens. Protection of the Tortolita Preserve should be extended and the land density increased with purchases from private landowners and the state to preserve this unique ecosystem that we live in. Let's be honest, Troon and North Scottsdale are some of the most desirable places to live in within AZ due to it's fervent dedication to conservation of open space and few massive master planned communities. Marana/Dove Mountain are in that category and have the opportunity to retain that desirability-BUT if the city greedily destroys it's only asset-the open desert-what's left for Marana?!
116	Kevin Kismet	page 1-11, Table 1- 1; page 2-13 Table 2-1; page 2-14 Figure 2-3; page 2- 15; page 2-18. page 4-10 Table 4- 1; page 3-17 Figure 3-2; page 2-14 Figure 2-3	State Land	I oppose creation of a new land use category called SPA, Special Planning Area (pp. 2-15 and 2-18), its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3), and the concept of making any changes to it a "minor" change in the General Plan (Table 1-1). Instead, I support retention of the land use categories for remaining State Trust Land implied by Fig. 5.1.D of the 2010 General Plan. Very tricky Marana...we certainly will make the voters aware of your first step in a multi-step plan to blade the pristine desert for the greed of developers, commerce and hypothetical need to fill the Marana coffers. able 4-1 indicates that the 9.7 mile Tortolita Preserve Trail will be retained. However, Tortolita Preserve is not shown in Figure 3-2, Parks and Recreation. Further, the region of the Tortolita Preserve is shown as being assigned a land use category of Special Planning Area, where any mix of commercial and residential land use would be permitted. I have previously commented that I oppose the creation and use of "Special Planning Area" in its entirety. With this comment I am opposing the apparent elimination of the Tortolita Preserve and favor its retention as Parks/Open Space, as it was in Fig. 5.1.D of the 2010 General Plan.
117	Kay Hayworth	Land Use	State Land	I support the retention of existing land use categories on the Tangerine Corridor (2 houses per acre) and Tortolita Preserve (100% open space).

118	Maria Iannone	Figure 2-3 on page 2-14 and relevant test	State Land	<p>The Tortolita Preserve is no longer designated in the 2040 Future Land Use Plan. Marana residents and nearby others relied on the longevity of the Tortolita Preserve easement when purchasing homes or otherwise making land use decisions. Marana should abide its past commitments to its constituents and keep the Tortolita Preserve permanently. The new Special Planning Area designation that covers the current preserve appears to be a way for Marana and the Arizona State Land Department to create a process leading to relatively easy high-density and commercial rezoning of environmentally sensitive land, thereby robbing existing, uninformed, and/or unsuspecting homeowners of property values, quality of life (based on the impact of a change to high density and commercial zoning), and safety.</p>
119	Maria Iannone	Figure 2-3 on page 2-14 or any other relevant pages	State Land	<p>I object to the inclusion of approximately 885 acres of land owned by the State of Arizona that is located north and south of Tangerine Rd and bordered on the North, East, West and South, respectively, by Moore Rd, Thornydale Rd, Shannon Rd, and Camino del Norte (referred to as the Tangerine State Land) within Marana's planning boundary. If such parcel continues to be included within Marana's planning boundary, I further object to any land use designation of the Tangerine State Land that does not align with the current land-use designation (i.e. Suburban Ranch) set by the now-controlling jurisdiction (i.e. Pima County). People residing outside Marana receive no formal notice of Marana's actions, rely on land-use planning of the controlling jurisdiction, and believe those land-use restrictions are meaningful and enforced against everyone – even an abutting municipality. As a result, Marana, insidiously, can push, and has pushed, through planning designations on property outside their jurisdiction that adversely affect landowners in adjoining jurisdictions who have had no notice. The development of the Southeast corner of Tangerine and Thornydale is a prime example. That development significantly impacted the downstream watershed, increased traffic, contributed to light pollution, and destroyed environmentally sensitive vegetation and wildlife habitat. The Tangerine State Land has been the subject of decades of objective, science-based conservation planning by Pima County. The parcel is described, among other things, as "lands of high environmental quality" and subject to "multiple layers of</p>

120	Sandra Wilson	2 - 14 and any other relevant pages	State Land	<p>We do not support the following parts of Marana’s proposed update to their 2040 General Plan: a) Inclusion of the 885-acre “Tangerine State Land” owned by the Arizona State Land Department within Marana’s development area; b) Designation of this “Tangerine State Land” as a Special Planning Area, as this opens it up to higher density development. If the parcel is included in Marana’s updated General Plan, then Marana should be consistent with the parcel’s current R1-144 zoning and designate it Rural Residential. Marana should acknowledge and accommodate the neighborhood residents, who purchased their homes and properties because of the views, tranquility, and abundant wildlife the area affords. Development under a Special Planning Area will transform this area into a less desirable neighborhood and negatively affect our property values. The 885-acre “Tangerine State Land” is currently zoned low-density and Marana should respect that designation by either leaving it out of the Marana development area in their 2040 General Plan altogether, or by showing it in the General Plan as Rural Residential. Thank you, Sandy Wilson Ben Wilson Neighbors at 11320 N. Shadow Vista Place, Oro Valley</p>
121	Richard & Cynthia Osier	Page 1-10	State Land	<p>Change to MAJOR. Table 1-1 shows SPA, Special Planning Area (the ASLD or State Trust Land designation) is all proposed to be MINOR. The 20.5 square miles of ASLD, including the 885 acres adjacent to our properties, is proposed to have SPA zoning through the proposed General Plan. We do not want this to happen as we purchased our properties based upon the zoning of the land in and around our properties. The other thing we would like to change is the MPA listed on the table as it is mostly listed as MINOR. We want to request that to be changed to MAJOR. Why do we want this changed? We want our neighborhood and others like us to be heard as Marana works with the State Land Department on the development process. Under a minor designation the General Plan says it simply has to pass the Town Council by a simple majority vote. This would greatly reduce the ability of the property owners paying some of the highest property tax rates in the region to have a voice in the process. For more clarification also see page 2-15 though 2-18, see map/figure 2-3. We Request that the zoning on the 885 acres remain as it currently stands. No change to the zoning through the new General Plan process.</p>
122	Barbara Pettit	State Land	State Land	<p>I object to the designation of the Tangerine State Land as “Special Planning Area,” and I insist that Marana be consistent with the Tangerine State Land’s current R1-144 (Suburban Ranch) zoning and designate the parcel “Rural Residential” for purposes of the Plan, and I insist that Marana apply the Plan amendment processes in Table 1-1 of the proposed Plan to change the Rural Residential designation. The beautiful desert we enjoy daily adds to the rural environment we chose to raise our families in. This addition will destroy the desert, and will add so much traffic (especially on Camino de la Tierra) and we won’t be able to safely walk or ride horses anymore. Please don’t ruin our neighborhood with hundreds of houses. Keep the zoning and keep the desert.</p>

123	Diana Barnes	2-15, 2-18, map/figure 2-3	State Land	<p>Make Marana 1940? Unlimited land to develop and no worries about a hotter planet. That was then, this is now. Phoenix's night time temperature has increased by nine degrees and the city is desperate not to become unlivable. Shall Marana become Phoenix in twenty years with concrete and asphalt choking what's left of natural desert? Marana needs to protect the limited pristine lands in the NW, including the Tortolita Preserve and the 885 from State Trust Land by not allowing it to be easily rezoned and ultimately bladed. This is what STL proposed doing through their manipulation of Oro Valley. The Special Planning Area is Not MINOR, allowing it to be rezoned with a simple majority vote. This is some of the last remaining pristine land, providing habitat and water retention and cleaner air for NW Tucson. Please classify it as MAJOR and give it stronger protection. Once it's gone, it's gone. The children of 2040 will thank you.</p>
124	Jeff Blau	Page 44	State Land	<p>I object to the designation of the 885 acres of Tangerine State Land as a "Special Planning Area". I insist that Marana be consistent with the Tangerine State Lands current R-144 (Suburban Ranch) zoning and designate the 885 acre parcel "Rural Residential" for purposes of the plan. I also insist that Marana apply the Plan amendment process in Table 1-1 of the proposed Plan to change the Rural Residential designation.</p>
125	Adriana Martinez	Page 2-56 Policy BE 35-2	Technical edit	<p>Regularly communicate with private utilities regarding Town expansion plans.</p> <p>Comment: TEP representatives regularly attend Pima County's "regional coordination meetings," which include representatives from Marana. We also welcome further one-on-one meetings to discuss town expansion plans.</p>
126	Adriana Martinez	Page 4-17 Energy Element	Technical edit	<p>The two energy providers in Marana are Tucson Electric Power and Trico Electric Cooperative. These suppliers provide power from coal, nuclear generators, natural gas, solar photovoltaic, and hydroelectric power plants.</p> <p>Comment: Please add wind turbines to the list. TEP does not generate nuclear or hydroelectric power; however, we do purchase energy on the market, which may come from those sources.</p>
127	Adriana Martinez	Page 4-25 Policy RS-14.1	Technical edit	<p>Develop a strategic plan to ensure coordination between the Town of Marana and power utility companies for future growth capacity needs.</p> <p>Comment: TEP has many processes where we evaluate future energy needs in the communities we serve. We welcome further opportunities to collaborate with the Town.</p>
128	Adriana Martinez	Policy RS-14.2	Technical edit	<p>Work with Tucson Electric Power and Trico Electric Cooperative to develop educational material for energy conservation and energy-saving tips that can be distributed to the community.</p> <p>Comment: TEP has existing energy efficiency resources and materials available for customers that we would be happy to distribute at community outreach events. We are also happy to provide them to the Town or community organizations for further distribution.</p>

129	Wayne Siros	Page 2-14	State Land	<p>Figure 2-3 on page 2-14 and relevant test The Tortolita Preserve is no longer designated in the 2040 Future Land Use Plan. Marana residents and nearby others relied on the longevity of the Tortolita Preserve ease when purchasing homes or otherwise making land use decisions. Marana should abide its past commitments to it constituents and keep the Tortolita Preserve permanently. The new Special Planning Area designation that covers the current preserve appears to be a way for Marana and the Arizona State Land Department to create a process leading to relatively easy high-density and commercial rezoning of environmentally sensitive land, thereby robbing existing, uninformed, and/or unsuspecting homeowners of property values, quality of life (based on the impact of a change to high density and commercial zoning), and safety.</p> <p>Figure 2-3 on page 2-14 or any other relevant pages I object to the inclusion of approximately 885 acres of land owned by the State of Arizona that is located north and south of Tangerine Rd and bordered on the North, East, West and South, respectively, by Moore Rd, Thornydale Rd, Shannon Rd, and Camino del Norte (referred to as the Tangerine State Land) within Marana's planning boundary. If such parcel continues to be included within Marana's planning boundary, I further object to any land use designation of the Tangerine State Land that does not align with the current land-use designation (i.e. Suburban Ranch) set by the now-controlling jurisdiction (i.e. Pima County). People residing outside Marana</p>
130	David Bowerman	Pages 23, 38, 39, 44, 71, 102, 130, 131	State Land	<p>My wife and I moved to Dove Mountain in February of 2018, after having lived in Oro Valley since 1997. I have lived in either Ajo/Tucson/Oro Valley/Marana for the past 60 years. I am a 5th generation Tucsonan. We enjoy biking, walking and especially hiking the fantastic trail system we have here in Marana. The Wild Burro/Tortolita Trails are amazing. Well signed and very well kept. Marana Parks and Recreation do a fantastic job up there. Thank You to all of them! Last January, I obtained a State Land Department Permit because I also enjoy hiking or biking the Tortolita Preserve. I was disappointed to see that the maps/figures of this 178 page document do not show the Tortolita Preserve. Are we not about 19 years into this lease to preserve this 2400 acre tract of Sonoran desert? The maps on pages 23, 38, 39, 44, make no mention of the Tortolita Preserve. They show proposed arterial roadways crossing this area, but the Preserve is not shown. Page 71, the SPA, Special Planned Area, does mention that Marana will work with the Arizona State Land Department to retain the Tortolita Preserve. I just hope that is what will happen. There are thousands of other residents here that feel the same way. Page 102 states that all parks/Preserve are identified in figure 3-2. Not so. The Tortolita Preserve is not identified there. Page 130, speaks of the Conservation of Maranas Natural Resources, with a photo of an owl in a Sahuaro. I hope so. Page 131, speaks of the Open Space Element. The NUOS, Natural Undisturbed Open Space. I hope so. Figure 4.1, no Tortolita Preserve on that map either. Most of the land to the south and west of Dove</p>

131	Diana Barnes	Pages 1-10	State Land	How will this new general plan make Marana a green, sustainable city by 2040? How will Marana be a healthy place to live and grow if the natural environment, such as the Tortolita Preserve and the 885 acres in northeast are given the least protection. The Special Planning Area only gets MINOR status leaving it vulnerable to out of town developers. Pristine lands which cool, clean and provide fresh air for us as well as habitat for wildlife deserve the protection of MAJOR classification so it is not easily re-zoned and lost forever.
132	Miriam Kirsten	Page 1-11	State Land	The citizens deserve more opportunities to voice ideas, concerns and suggestions regarding SPA and MPA designations. Currently in the proposed General Plan, MPA and SPA require almost exclusively, Minor amendments to the General Plan. Existing residents desire, and should be entitled to, increased participation and input in formulating their growing communities. We basically demand, as citizens effected by said growth, that ASLD and town of Marana have all land annexations and rezonings from current zoning be major plan amendments.
133	Carol Duffner	Pages 1-11, Table 1-1; Page 2-13 Table 2-1; Page 2-14 Figure 2-3; Page 2-15; Page 2-18	State Land	I hereby oppose the creation of a new land use category called SPA, Special Planning Area (pp.2-15 and 2-18), and its assignment to 20.5 square miles of State Trust Land (Table 2-1 and Figure 2-3, as well as the concept of making any changes to it to be considered a "minor" change in the General Plan (Table 1-1). In lieu of, I support retention of the land use categories for remaining State Trust Land implied by Figure 5.1.D of the 2010 General Plan.
134	Richard Miller	General	State Land	I'am a property owner in both Marana and Oro Valley ajasent to state land their objective is to make a bank of 10,000 residents on this parcel of land then sell off parcels slowing the developer to take from bank as many lot They don't want to provide adequate buffering areas and want each parcel to have ther own HOA and don't want to negotiate with surrounding home owners they want open zoning for the parcels
135	Ruben Esparza	3-12 disaster planning, 4-12 Sustainability	Climate Change	In your glossary, the definition of sustainability comes just before the definition of Town Council. I find this ironic in that there is not one mention of climate change, adaptation to environmental changes or anything that sounds like planning for climate change in this plan. It is clear to me that global climate change is not a political argument. It is reality in the present. It now affects the Marana area. Temperatures where I live near Marana have peaked at over 120 degrees in the summer and dropped to 15 degrees in the winter. This is much more extreme than I have seen in the Marana area in the last 30 years. Rain, wind and dust storms are much more extreme than I can remember. My understanding is that this document is a twenty year plan. It might be a good idea for someone, somewhere to inform the town council that adopting this plan as written puts the Town of Marana 20 years behind the climate change curve. Moreover, Section 3-12 arguably obligates the Town to recognize potential hazards due to climate change and to plan accordingly

136	Scott & Linda Roy	pg. 4-19 (Goals and Policies for Resources and Sustainability), pg. 2-13	Climate Change	Why isn't there a stated Town goal regarding mitigation of the effects of climate change over the next 20 years? Preservation of quality of life, should be the emphasis of the 2040 plan, not development and urban sprawl. What's the current land use percentage of "Open Space" versus the 2040 land use projection of 6.4%? People live in Marana for its open spaces and beauty. Its Citizens don't want another Phoenix. Keep Marana rural and natural.
137	Richard Dickson MD	Pg 1-10	Amendments	We absolutely need transparency, need to have our voices heard; Change "Minor" to "Major" to allow full public input
138	Richard Dickson MD	Pg 2-33	Water	47 additional wells are very concerning as many families with existing wells will have water supply imperiled.
139	Richard Dickson MD	Pg 2-40 thru 2-42	NA	again, need to be able to have our voices heard publically.
140	Richard Dickson MD	BE 11-1 to 11-6	NA	NO "off site mitigation" in the yet to be annexed North East area. There are many established rural type homes and dense housing destroys the existing environment.
141	Richard Dickson MD	Pg 3-7	NA	the rural areas of low density residential areas need to remain rural, low density. Specifically, the area north of Tangerine, south of Moore, just to east of Thornydale. We need our voices heard, need to maintain our quality of life and environmental protections of vegetation and wildlife, and need to have assurances of our water wells.
142	David Barker	Page 1-10	State Land	I am a full time resident of The Highlands, Dove Mountain. Like many of my neighbors, I moved here with the assurance that the Tortolita Preserve was open space that would be maintained as such for many, many years - a 100 year lease guaranteed that. Considering the robust development happening in the area, it seems like parcels such as the Tortolita Preserve are critical for appeal of the area, recreational opportunities, wildlife habitat, and maintaining views. I am disturbed to read in "Make Marana" that city planning is intending to make those critical decisions easier for the city, with little public input, by redefining them as "minor." I can guarantee to Marana that those of us who value The Tortolita Preserve - and other parcels of State Trust Land - do not consider any moves to develop those lands as "MINOR." A balance must be maintained - endless sprawl my pay short term benefits, but overdevelopment will gravely harm a spectacular corner of the Sonoran Desert that Marana occupies. Respectfully, Dave Barker Marana, AZ
143	Scott Lebow	2-14, among others	State Land	I strongly object to designating the Tortolita Preserve and other areas immediately adjacent to it as a SPA. If I understand this correctly, this would allow city officials to rezone this space with little to no public input. This is a wonderful open space, and deserves to maintain that status, at least to a significant degree. Not every square inch of Dove Mountain needs to be paved over and filled with high density housing. Rezoning this area should require significant public notification and involvement, and not be a minor administrative item.

144	Shirl Lamonna	Page 1-10	State Land	<p>I am an Oro Valley resident who closely followed the efforts to rezone 885 acres of State land, annex it to pro-growth OV and destroy it with 3200+ living units and no regard for Arizona's drought conditions. Had the former developer friendly Town Council won their re-election bid last year, annexation would have been approved in October 2018. Thanks to numerous presentations and input from the public, the new Town Council requested the State consider a reduction in the number of living units and address some other concerns. The State did not submit a revised plan. In reviewing your proposed General Plan, it appears that State Land chose to shop it to Marana and you are willing to "buy" it and establish a Special Planning Area to get approval done quickly, even if it means increasing taxes on your residents. Zoning on this land should not be changed to allow more cluster housing and apartments. Your Finance Director introduced the need for a new tax for growth at the 9/25 Council meeting. Since Marana cannot currently supply water to that area, \$8-8.5 million is needed for a joint project with Oro Valley & Tucson to improve water delivery. So now a project that OV residents did not support due to the massive number of living units and general destruction of this pristine land is still going to cost our town? You want to ignore a 20 year drought and CAP restrictions? You want to eliminate public input with a General Plan that designates all State Land transactions as Minor Gen Plan amendments? Please reconsider and at a minimum, change the designation to a Major Plan amendment and leave current zoning on</p>
145	Richard Barnes	Water Resources	Water	<p>Water is more valuable than Gold The Tucson rain fall is not sufficient enough to replenish the aquifer with the amount water being pumped from the ground. Aquifers can take many years, if not hundreds of years, to replenish if not over tasked. So, adding to extensive community growth will hasten the rate of ground water depletion. Marana is not the only one that uses ground water, many of Marana's neighbors solely rely on ground water and if Marana, Oro Valley and Tucson deplete the ground water then others will greatly suffer. Additionally, the recent CAP water allocation for Arizona has been drastically reduced. To add to this we are in a continuing drought and it will only get worse. Due to the unknown water supply, Marana needs to consider very aggressive water conservation plans and infrastructure. This includes: less development, water reuse, and develop ground water recharge zones. This is not possible with high density housing development. More open spaces need to remain to allow nature recharge of the aquifer. Limit development; development exponentially increase water usage, increases water pollution, and requires more waste water treatment as well as potable water treatment for reliable/safe water for the community. Increased development and high density housing development is a penny wise – pound foolish thinking process for increasing revenues for the city, it actually greatly increases costs more in the long run.</p>

146	Alyssa Page	1-10, 2-41, 2-42	State Land	Table 1-1 shows State Trust Land (SPA) has only a MINOR General Plan Amendment process for any and all changes. This is not right, especially considering that the Town of Marana and the State Agency--ASLD are both government entities. The People NEED to have much more input on any and all decisions or agreements that would change the zoning from its current status. Land use changes should never be put in a government's General Plan because of the lack of direct contact to those most affected. A General Plan is a general document guiding future decisions and plans, whereas, zoning is a very specific set of entitlements. These should not be mixed for this very reason. Please change the requirement from Minor to Major General Plan Amendments for all SPA and MPA zoned areas to increase the public's opportunities to be involved in the planning, designing, and layout of their community. Trust the People. The residents are a willing and able partner, we are the most invested in building and growing the best community possible.
147	Alyssa Page	Page 2-3	Growth	On the bullet point Growth. The Town should manage "growth of the Town in a fiscally sustainable manner." This should be changed to-- manage growth of the Town in a fiscally and environmentally sustainable manner.
148	Susan Mears	General	NA	We have been residents of Marana for 7 years and am very happy with the town and hope to remain here for many more years. But we are particularly disappointed in the ongoing plan to develop the land at Thornydale and Tangerine and in the Dove Mountain area. We are losing the beauty of this environment and most importantly native plants and land that can never be replaced. We ask this you consider this when making decisions and please include the residents of Marana in this process. I would also like to add that the town has been building many independent/dementia type developments and that the town has over 55 golf communities but in this area specifically they do not have an over 55 community, without gold, with smaller home or attached homes where the maintenance of yard, roof and so on is not done by the homeowner. We feel this is really lacking in this area. You might want to look at Vistoso Village in Oro Valley as a model for this type of community. We are happy to talk or meet with anyone about the above comments. Thank you.
149	Richard Barnes	People and Community	NA	2040, What Will Communities Look Like. The trend now is for less store fronts, more online shopping, and working from home. Houses will fit with the environment; they will be earth sheltered homes with solar power, rain harvesting, and other water conservation methods, such as, grey water, more open spaces and desert appropriate vegetation for cleaner air and water. Social activities will be more important and commercial space will be a diversity of housing, theaters, restaurants, and some boutique shops. Commercial space will have less "in your face" parking lots and more out-of-the-way parking or parking under-ground, and the commercial space will be in walking/biking distance from other communities, with more outdoor natural space and activities and not 1960's heat sink, polluting ugly strip malls. This is what Marana 2040 should look like!

150	Alyssa Page	Goal BE-11. BE 11-1 & 2	Conservation	There needs to be appropriate zoning standards created and adopted so the codes of the town will protect the land under its jurisdiction and the area will retain the special uniqueness of the place and character of the land. We need to grow very responsibly. The residential developments and commercial should maximize what makes Marana and the surrounding areas unique. The Sonoran Desert flora and fauna and our mountains are what makes our area remarkable and unique.
151	Alyssa Page	BE 11-3	Conservation	Yes please do this and involve less blading of the entire site. Also, when blading is used please have rain water harvesting on each property as the main way of dealing with storm water and minimize large retaining basins for residential areas. This will lead to water use savings and less mosquito issues around neighborhoods.
152	Alyssa Page	BE 11-6	Transfer of Development Rights	"NO!" to TDR or what others call Off-site mitigation. Many of the areas are remarkable in how lush the desert is, this should not be used in Marana.
153	Alyssa Page	Pages 2-41 and 2-42 Goal BE-12	State Land	The section on SPA (Goal BE-12) One bullet point says, "Appropriate areas intended for conservation due to the presence of sensitive environmental resources..." This needs a lot of work for anything real to happen. Working with State Land on conservation is great lip service, but how will this be accomplished? The public should be involved and mapping of significant species ironwoods and other important cacti should happen sooner rather than later.
154	Alyssa Page	Figure 2-3, page 2-14 also refers to the Tourism section 3-8 and page 4-3 and 4-8.	State Land	Where is the Tortolita Preserve? Why does it already have a zoning of SPA put on land that is supposed to be put a side for the habitat disruption that happened with the building of Dove Mountain and commercial entities like the RITZ. The Tortolita Preserve deserves its own distinct designation and should not be missing from the entire document. If the Town wishes to conclude the lease that should be done in a separate and very public way with lots public discussion and outreach. More needs to be done to actually get more open space into the NUOS designation. Where is the plan for this?
155	Alyssa Page	Action. number 137 on page 5-21	Conservation	Move this from a long term goal to a short term goal. This needs to be done NOW not in ten years. We need more codes that clarify protecting our land, our plants and our animals for EVERYONE's enjoyment.
156	Harry Tripp	NA	NA	I think that the Make Marana 2040 Map Atlas dated February 25, 2019 should be merged with the Make Marana 2040 60 Day Review Draft dated July [no day; comments were started on 29th; Aug is more accurate] 2019 with comments welcomed for the entire document. Further, I think all of the comment and redraft periods should be doubled so that the final draft for ratification is produced by March. 2020.

157	Alyssa Page	Page 4-24 and 4-25	Conservation	<p>Yes, please craft, improve and adopt an Open Space and Wildlife Conservation Master Plan. Please strengthen the protections of plants on the land throughout the town also, so that the people and nature and live in a healthy balance together. We can make room for nature in all our developments no matter the zoning. What are "innovative methods" for acquiring and preserving important natural resources? What does this mean? One suggestion would to establish a fund in the Town of Marana that is set aside for purchasing sensitive and significant land from ASLD. Please do assess and improve on the side of additional conservation the Town's Land Development Codes. What is "land development guidance?" The higher the density of a project the more land that needs to be put aside for said residents to enjoy. More conservation should be required for high density housing and generous buffers should always be used when densities of neighborhoods don't blend well. More should be done to make any project more naturally storm water neutral by using rain harvesting gardens that "plant the rain."</p>
158	Doug Anderson	Developments & annexation	Noise	<p>My address 12770 n. Coyote crossing Tr. Tucson-85755 The current road noise does not allow me to have my windows open and enjoy fresh air. The noise takes away from simple enjoyment from patio, pool & barbecuing And eating in rear yard. Any future or further developments in The area needs input from neighbors & neighboring properties. Also with planes in the area, safety & noise have to be considered. We have been served successfully with well & septic In the past and future development could substantially impact our utility services . So Roads, noise, water , sewer are some of my concerns and I should have input as a neighbor... Sincerely, Doug Anderson</p>
159	Richard Barnes	Transportation Element	General	<p>Transportation, Rethink Requirements and Future Costs To think Marana will have business activities that will accommodate most of the city's work force is not possible, nor feasible. Thus, inexpensive, convenient, less polluting transportation is the future of any city. Well though-out and designed transportation infrastructure is need now for the future. Rail access into Tucson and continuing to Nogales, as well as, northwest to Phoenix and in-between, should be of high priority. Electric cars will help reduce noise and air pollution. Start with encouraging residents to purchase electric cars. Establish free public charging stations throughout the community; restaurants, theaters, libraries, schools, shopping areas and houses of worship. Encourage these businesses to provide charging stations for their customers. City vehicles should all be electric where feasible. Additionally, encourage businesses to also use electrical vehicles where feasible. Build more bike lanes, away from vehicle traffic, so to enable residents to travel via bike to work, stores, parks, etc. The Marana airport could accommodate more business jet traffic, but this would increase the disruptive noise, air, and water pollution. Therefore, a well planned jet port authority should ensure safe approaches with no building along departure and arrival corridors. Current safety zones are inadequate. These safety zones will be untouched space for not only safety, but also for noise abatement. Limit lighting to the absolute minimum (and limit night time operation) and put in pollution safe guards, plus inspections (open to the public) to insure low impact to the environment and</p>

160	Carol Duffner	Figure 2-3 on page 2-14 and relevant test;	State Land	<p>The Tortolita Preserve is no longer designated in the 2040 Future Land Use Plan. Marana residents and nearby others relied on the longevity of the Tortolita Preserve ease when purchasing homes or otherwise making land use decisions. Marana should abide its past commitments to its constituents and keep the Tortolita Preserve permanently. The new Special Figure 2-3 on page 2-14 and relevant test - Planning Area designation that covers the current preserve appears to be a way for Marana and the Arizona State Land Department to create a process leading to relatively easy high-density and commercial rezoning of environmentally sensitive land, thereby robbing existing, uninformed, and/or unsuspecting homeowners of property values, quality of life (based on the impact of a change to high density and commercial zoning), and safety. Figure 2-3 on page 2-14 or any other relevant pages - I object to the inclusion of approximately 885 acres of land owned by the State of Arizona that is located north and south of Tangerine Rd and bordered on the North, East, West and South, respectively, by Moore Rd, Thornydale Rd, Shannon Rd, and Camino del Norte (referred to as the Tangerine State Land) within Marana's planning boundary. If such parcel continues to be included within Marana's planning boundary, I further object to any land use designation of the Tangerine State Land that does not align with the current land-use designation (i.e. Suburban Ranch) set by the now-controlling jurisdiction (i.e. Pima County). People residing outside Marana receive no formal notice of Marana's actions, rely on land-use</p>
161	Alyssa Page	Page 4-20	State Land	<p>The word at the top of page 4-20 does not make sense in the context of the sentence. "Advocate efforts of the ASLD to preserve high-quality natural undisturbed open space." "Advocate" means to support or champion or promote. Are you promoting ASLD efforts?? The State Land Department is not known for its conservation, rather it is known for auctioning (or leasing) land in jurisdictions like Marana. Highest price is always the goal of the State Land Department. Highest price and conservation are diametrically opposed. So, unless the Town of Marana strengthens its codes regarding open space, species protections for plant and animals, etc... prepare to be pushed into development that is not in balance nor in harmony with the natural landscape nor the existing neighborhoods. The ASLD does not seem to understand that the Tortolita area is not Phoenix and they will push for extremely high density and low open space requirements. ASLD balked at having more than 38% open space on the Tangerine State Land proposed annexation with Oro Valley. Get your codes beefed up to handle the demands that State Land will inevitably ask of you.</p>

162	James Banis	Page 1-10	State Land	Major and Minor General Plan Amendments differences and ALL State Land transactions would under this plan are MINOR. These should be listed as MAJOR. Table 1-1 shows SPA, Special Planning Area (the ASLD or State Trust Land designation) is all MINOR. 20.5 square miles of ASLD is proposed to have this SPA zoning through this proposed General Plan. This should be listed as MAJOR. The MPA listed on the table is also mostly listed as MINOR and this should be changed to MAJOR also. REASON: The local neighborhoods should be part of this process and be heard as Marana works with State Land Department on the development process. The minor designation the General Plan says it simply has to pass the Town Council by a simple majority vote. This would greatly reduce neighboring landowners say in the process and input would be limited. Additionally requested is that the zoning on the remain as it currently stands. No change to the zoning through the new General Plan process.
163	James Banis	Page 2-33	Water	"47 additional wells." will reduce the groundwater viability especially with drought and the recent Colorado River restrictions and reductions. Any additional water draw needs to guarantee existing landowners of water supply with existing infrastructure (wells would not have to be drilled deeper).
164	James Banis	Page 2-40 and 2-41	Residential	Lot Size Reductions/ Off Site Mitigation & Natural Resources/Conservation of the Environment - Lot size and zoning to any adjacent properties should be similar to those properties to retain low density rural zoning. Smaller lots should be phased in at a reasonably agreed upon distance from local neighborhoods.
165	James Banis	BE 11-1 though 11-6	NA	Off Site mitigation does not help preserve the local site. All mitigation should be on-site.
166	James Banis	BE 13-3	State Land	ASLD process should be public and with local affected neighborhoods mandatory input. This will build trust with the locally affected neighborhoods and community.
167	James Banis	Page 3-7	Tangerine Road	"Tangerine Road Corridor". Is the intention to keep this "rural". The desire of local residents and community is to retain the "rural" design and intent.
168	James Banis	Page 4-8 through 4-10	State Land	Regional Open Spaces —"Tortolita Preserve" needs to be added in to this. The "Tortolita Preserve" is not listed any where in the list nor in the entire General Plan document. On the new General Plan maps the preserve is gone and is swallowed up in the SPA zoning designation for ASLD.
169	James Banis	Page 4-15	Conservation	Conservation "Land Development Code's Native Plant Protection Landscape Requirements" should be more robust. Additionally, a "Habitat Conservation Plan" should be adopted.
170	James Banis	Page 4-19 RS 2-4	State Land	Neighboring communities and properties know that 885 acres has significant vegetation and ASLD is not adopting a current map generated by Oro Valley. This map should be included and referenced. Also, the "Tortolita Preserve" is supposed to be conserving 2400 acres of significant open space.
171	James Banis	RS 12-1 through RS 12-6	Buffers	Apply appropriate natural buffers and compatible zoning close to Rural Residential zoning areas to transition in a a rational manner.

172	James Banis	Implementation Goals Page 5-21 Action 136 and 137	Conservation	Updating Land Development codes and adopting an Open Space and Wildlife Conservation Master Plan should be worked on now so that current issues and needs are addressed in the short term before development - not 10 plus years out.
173	Carol Barker	Page 1-10	State Land	The SPA (Special Planning Area) should be classified as major, not minor. Changes to School trust lands which are now open space need to be sensitive to resident input, not just to a majority of the Town Council.
174	Carol Barker	Page 1-10	State Land	This may be a repeat. This site did not allow me to print my original comments, so I don't think they were recorded. The SPA designation should be classified as major. In particular, state trust lands currently preserved must be subject to residents' desires, not simply a simple majority of the Town council.
175	Carol Barker	Page 2-33	Water	The requirement for 47 additional wells is staggering. Has anyone factored in that we live in a desert? And that global warming will only make potable water less available?
176	Lois Morey	2-18, 1-10	State Land	On page 2-18 Arizona State Land Department property is designated as SPA. This Make Marana 2040 General Plan identified SPA area in the category of Minor Amendment. The SPA designation should fall under the category of Major Amendment since these areas clearly require a substantial change to land use and also require re-zoning. In the absence of categorizing all SPA areas as Major I would request that areas less than 1000 acres be categorized as Major. I believe it is only fair that residents surrounding small State Land areas have a say in the zoning and use since the properties located adjacent to these small parcels are greatly affected by the development. I would also ask that rezoning of small SPA areas (less than 1000 acres) be subject to the same process as any other Town of Marana property and that all adjacent properties affected by a zoning change be notified.
177	Carol Barker	Page 2-40	Conservation	OK unless "best practices" include off-site mitigation is considered a best practice. We need to keep native plants intact in currently preserved areas.

178	Lynn Bianchi	pages 1-10,2-33, 2-40,2-41,2-42,2-48,3-7,4-8 to 4-10,4-12,4-15,4-19,4-20,4-24,4-25,RS12-1 through RS13-4, Page 5-21,Action 136,137	State Land	I am speaking as a home owner in very close proximity of the planned Marana future developement. I am very concerned our input is not being heard. Please change all General Plan Amendments and all State Transactions from Minor to MAJOR. We also do not want SPA zoning through the general plan. I have read where 47 additional wells will be needed. This is outrageous. Our water tables are dropping already. I am requesting zoning on the 885 acres to remain as it stands with no change to zoning through the General Plan process. I live in a very special area and do not want to be unable to provide input. I do not want BE-11-6 to happen by us. BE12-1,BE12-2 needs to grant process so we have voices that are heard. BE13-3 ASLD meetings need to include the public. I don't trust the ASLD to make decision for this area without public input. BE22-2 Habitat connectivity should be a priority, not treated as a"feasibility". Tangerine Road Corridor is very close to our rural homes and acreages, it should be maintained as such. Over development would surely diminish the character of our special area, destroying our beautiful trees, giant saguaros, and abundant wildlife. Tourism would certainly decline and interest in living in this sort of place would disappear. Why is ASLD denying a map done by Oro Valley? What happened to the Tortolita Preserve? Why is it not mentioned anywhere? What is the environmental plan, example flood plains? Again, conservation should be a priority. Can we strengthen the Land Development Code's Native Plant Protection Landscape Requirements and adopt a Habitat Conservation Plan? I
179	Carol Barker	page 2-42	State Land	"Establish regular meetings with the Arizona State Land Department, Bureau of Land Management, Bureau of Reclamation, and other public land agencies to discuss long-term land management objectives and areas of alignment and mutual benefit and interest." These meetings need to be open to the public, not just the council.
180	Thomas Hannagan	General	State Land	I agree 100% with the 17 points made in the comment letter from the Coalition for Protection of the Sonoran Desert, dated 09/27/2019. In addition, I would add: Changes to the SPA lands should be "major" considerations, not "minor" in nature. These are fairly large tracts and deserve due consideration by the public before going to the Council. The Tortolita Preserve should be shown on the maps, and labeled in a manner that indicates Marana's intentions for the remainder of the lease. The Tortolita Preserve is NOT the same as other state trust land, that is not leased by the Town, and should be treated differently. Marana has, on past occasions, stated their intention to keep the Tortolita Preserve as open space (regardless of labeling issues) and I would like to see this remain the case. In fact, I'd like to see Marana be proud of setting it aside, rather than hiding it. Given the size of the Town, there is minimal green space, other than unbuildable river ways and parks owned by the State or Federal governments. Marana needs to stay in step with the times and make sure more open space is designated within the Town's purview. The Tortolita Preserve is perfectly located for this purpose and large enough to provide natural habitat.

181	Carol Barker	Page 4-8 through 4-10	State Land	Though you included the Tortolita Preserve trail in your Trail list, no where else is the Tortolita Preserve mentioned in this document. This preserve is a critical open space in the Dove Mountain area, particularly with all the new development around Tangerine and Dove Mountain encroaching on current open spaces. Please do not try to develop this space.
182	Carol Barker	Page 4-19 and 4-20	State Land	I applaud your future commitment to work with the Arizona State Land Department to "preserve high-quality natural undisturbed open space." It hasn't seemed to be a Marana priority in the past.
183	Carol Barker	Page 4-24	Conservation	I agree that an Open Space and Wildlife Conservation Master Plan should be developed and adopted. But it needs to be done as soon as possible, not in 10 years plus. Many of the other goals you've stated in this document are reliant upon having clear rules about open spaces and wildlife conservation BEFORE they can be implemented. So those other goals are meaningless without an Open Space and Wildlife conservation plan.
184	Julia Rotary	General	State Land	I SUBMIT HERewith A DOCUMENT PRESENTED TO ORO VALLEY TOWN COUNCIL AND MAYOR, AND PIMA COUNTY'S CHUCK HUCKELBERRY WITH REGARD TO THE DEVELOPMENT THAT INCREASES THE CURRENT ZONING IN THE STATE'S 885 ACRES MARANA NOW WISHES TO INCORPORATE. PLEASE GO TO THE ATTACHED ADDRESS TO READ THE STILL RELEVANT COMMENTS. (NOTE: IF YOU CANNOT OPEN THE SITE, THEN CONTACT CHUCK HUCKELBERRY'S OFFICE, AS HE HAD IT ENTERED INTO THE RECORDS, WROTE A RESPONSE AND MADE A REQUIREMENT ASSOCIATED WITH THE CONCERNS ADDRESSED THEREIN. https://drive.google.com/file/d/0Byy_mnD4tnl6M1pkOXBvY0ZtVVJsS1EzTE5FSXdueVZLNmFB/view?usp=sharing
185	Richard Miller	Page 1-10	State Land	The State wants to create a bank of 10,000 residents and allow parcel developers to take from the bank as desired and no restrictions or buffering requirements HOA will be set strictly by developer with no consideration of surroundings zoning this is very dangerous to property values in neighboring areas please think what this type of development will cost in roadway and underground expenses for 10,000 vrs 300 residents good luck Marana tax payers we have been thru this exercise with Oro Valley all ready please feel free to contact me
186	Richard Barnes	Wildlife crossings pg 4-16	Wildlife	Wildlife habitat not wildlife corridors! The area identified as wild life corridors are in fact wild life habitat, and as such should remain untouched or very limited development. Better idea: combine solar farms with wildlife conservation and/or farming. Not utilizing the space under solar panels is a misuse of valuable land resources. This would require the solar panel to be elevated to accommodate wild life or farming. Additionally, the game crossings are not practical. Most wildlife will not enter the culverts as noted in the Marana plan. Wild life would consider such crossings as threat and would rather try their luck crossing a road. A much better idea is to utilize road over passes as game crossings. Keep the wildlife and not gift to future generations only iron statues of deer or other wildlife.

187	Gary Kvasnica	State Land	State Land	Please leave the Tortolita Preserve as a Preserve. The appeal of Dove Mountain is that you feel close to nature. Overbuilding significantly diminishes from that attraction.
188	Suzanne Fish	Cultural / Archaeological Resources	Marana Mounds	The city of Marana has an unparalleled opportunity to proactively preserve what was one of the largest Hohokam towns in southern Arizona at A.D. 1200-1300. Northeast of the I-10 Marana exit, it covered just over a half square mile surrounding a central public precinct with an earthen platform mound. An estimated 800 to 1000 residents lived in over 40 compounds consisting of sets of adobe rooms within an enclosing wall. The Marana Mound settlement is truly unique because, unlike almost all others of like size, it has survived in its entirety without major destruction from modern land use or vandalism. The fragile foundations and floors of almost all adobe dwellings still lie just below ground. Numerous publications on Mound Site research have brought state and national recognition to Marana's Hohokam heritage and it is also well known to descendant O'odham communities. Its preservation is deemed a high priority in the Sonoran Desert Conservation Plan. In the draft Marana General Plan 2040, the locale is designated for residential development and transportation routes. Such intrusions would cause serious damage to site integrity. It would limit initiatives in connection with the Santa Cruz Valley National Heritage Area and future Marana efforts to engage archaeological interests among southern Arizona residents and tourists alike. Much of the Marana Mound site is situated on Arizona State Trust Lands, entailing an enhanced level of protection and requirements for mitigation. As a retired University of Arizona archaeologist aware of this site's significance in Hohokam cultural heritage, I strongly urge the city to
189	Carol Barker	Page 5-21	Conservation	Same comments as I had for Page 4-24. An Open Space and Wildlife Conservation Master Plan should be developed and adopted. But it needs be done as soon as possible, not in 10 years plus. Many of the other goals you've stated in this document are reliant upon having clear rules about open spaces and wildlife conservation BEFORE they can be implemented. So those other goals are meaningless without an Open Space and Wildlife conservation plan.