



April 11, 2025

SENT VIA EMAIL

Jason Angell, Director
Development Services Department
Town of Marana
11555 W. Civic Center Drive, Bldg. 2A
Marana, AZ 85653

Subject: Town of Marana Linda Vista 52 Annexation – Pima County Public Works Departments Comment and Recommendation

Dear Jason -

Thank you for the opportunity to review and comment on the Town of Marana Linda Vista 52 annexation. Pima County Public Works Departments offer the following comments regarding the proposed 52-acre annexation, located in northwestern Tucson, approx. 0.6 miles east of the intersection of W. Linda Vista Blvd. and W. Twin Peaks Rd.

Development Services Department, Planning Division

The annexation site (site) has Low Intensity Urban 0.3 (LIU-0.3) land use designation, to designate areas for low density residential and other compatible uses, at 0.3 residences per acre. The entire site is located within the Maeveen Marie Behan Conservation Lands System (see Conservation Lands and Resources Department comments, below), and the northwestern portion of the site is designated Flood Control Resource Area under the comprehensive plan (see Regional Flood Control District comments, below). The site has SR (Suburban Ranch) zoning, a rural low-density zone principally for single-family residences and associated conditional uses on large lots (minimum lot size = 144,000 square feet/3.31 acres). The zone also permits agricultural and ranch uses, and the large required SR zone lot size ensures considerable reservation of open space.

Department of Transportation

The Department of Transportation has reviewed the proposed Linda Vista 52 Annexation District. The Pima County Surveyor notes that the proposed annexation boundary does not align with and match the previous annexation district, Cortaro Vista, and requests corrections to the legal description (see attached **Exhibit A**).



Cultural Resources and Historic Preservation Office

A review of Pima County cultural resources records indicates that parcels 216-34-0670; -0680, and 216-35-0690 (T12S, R12E, S14) were previously surveyed in 1982 (Northern Tucson Basin Survey). However, the survey was conducted over 10 years ago and not surveyed to current standards. Due to the lack of updated, systematic cultural resources survey, it is unknown as to whether ancestral Native American sites exist on the property. Additionally, a portion of the subject property is within a predicted high archaeological sensitivity zone as defined in the Sonoran Desert Conservation Plan, increasing the possibility of cultural resources on the site.

Recommendation

A current on-the-ground, pedestrian survey by a permitted archaeological consultant is recommended prior to any proposed development on the subject property.

Conservation Lands and Resources Department

Onsite Resources

- The approx. 52-acre property proposed for annexation is entirely within Pima County's Maeveen Marie Behan Conservation Lands System (CLS), with approx. 42.7 acres in the Multi-use Management Area designation and approx. 9.3 acres within the Important Riparian Area (IRA) designation. The entire site is designated as a Special Species Management Area (SSMA).
- The property is located within the Priority Conservation Area for the cactus ferruginous pygmy-owl, which is listed as Threatened under the Endangered Species Act (ESA).
- Two large (2000-5000 CFS) washes with associated riparian habitat cross the property in a northeast to southwest orientation; one crosses through the extreme northwest corner of the westernmost parcel and the other crosses through portions of all three parcels. Other, smaller drainages occur onsite as well.
- The eastern parcel (216-35-0690) is partially developed and includes two residences, large already-cleared areas, and various dirt trails. The other two parcels (216-34-0670, 216-34-0680) are largely undisturbed and appear to have abundant native vegetation onsite, which likely includes ironwood trees (*Olneya tesota*) and saguaro cactus (*Carnegiea gigantea*).
- The two undeveloped western parcels were identified as Habitat Protection Priority Acquisitions under Pima County Conservation Bond Programs.

Landscape Context

The property sits approx. one mile east of I-10 on W. Linda Vista Blvd. The Linda Vista Village subdivision is adjacent to the west; otherwise, the surrounding lands are generally undeveloped and zoned for large lots (SR zoning in Pima County, C zoning in Marana). Lands to the northeast have mostly low intensity residential uses and are generally permeable, supporting wildlife



movement to and from large blocks of habitat in the Tortolita and Santa Catalina Mountains. Nearby County-owned Conservation Lands include the Cortaro-Hartman Preserve located approx. 0.75 miles south of the property, and the Cascada Preserve, located approx. one mile to the northwest.

Recommendations

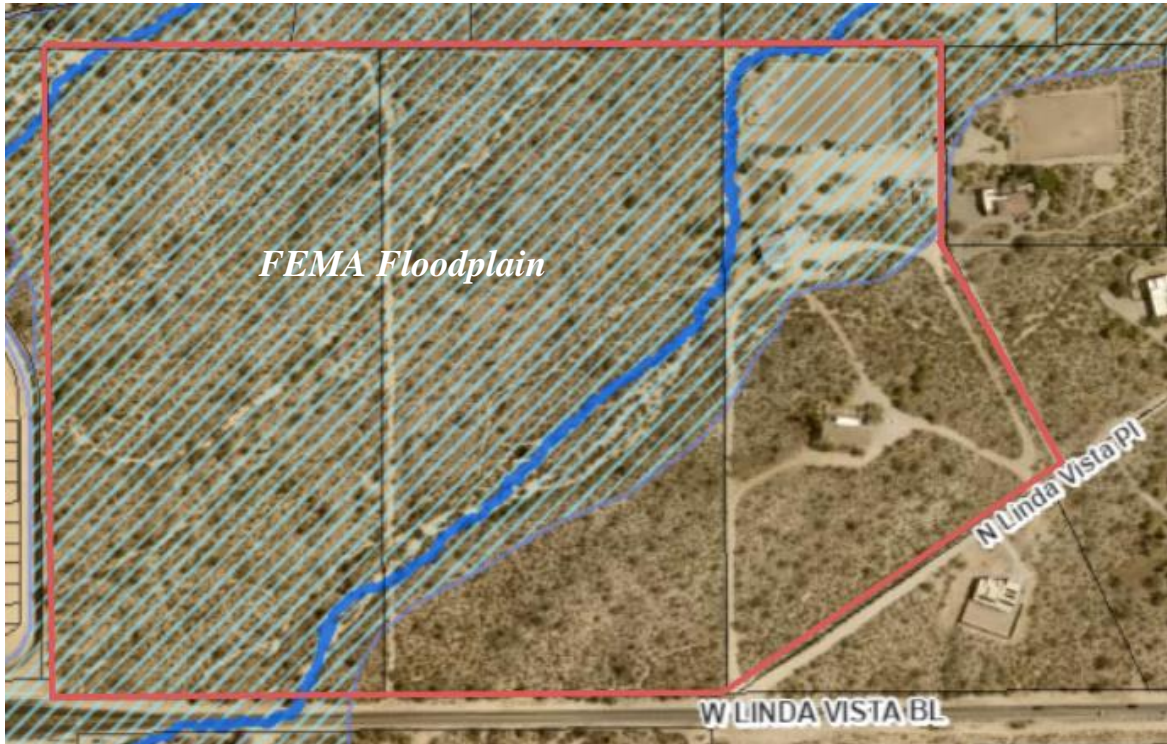
In the event this area is annexed by Marana, CLR-Environmental Planning offers the following recommendations:

- Should this property be subject to a rezoning request to increase the intensity of allowable land uses, we encourage Marana to apply the [CLS Guidelines](#) found in *Pima Prospers*, the county's comprehensive plan, to protect its conservation values as described above. The CLS Guidelines for the SSMA designation call for four acres of open space to be set aside as natural open space for every acre of development.
- The IRA-designated areas and associated riparian habitat should be left undisturbed to the greatest extent possible, as these areas provide important movement corridors that allow wildlife to move across the landscape and between larger blocks of habitat. Protecting these areas will help maintain landscape connectivity in this area.
- Areas set aside as natural open space, especially the IRA-designated areas and associated riparian habitat, should be buffered from any surrounding development to the greatest extent possible to protect them from indirect impacts like nighttime lighting and noise, which can discourage wildlife from using these areas and compromise their functionality.

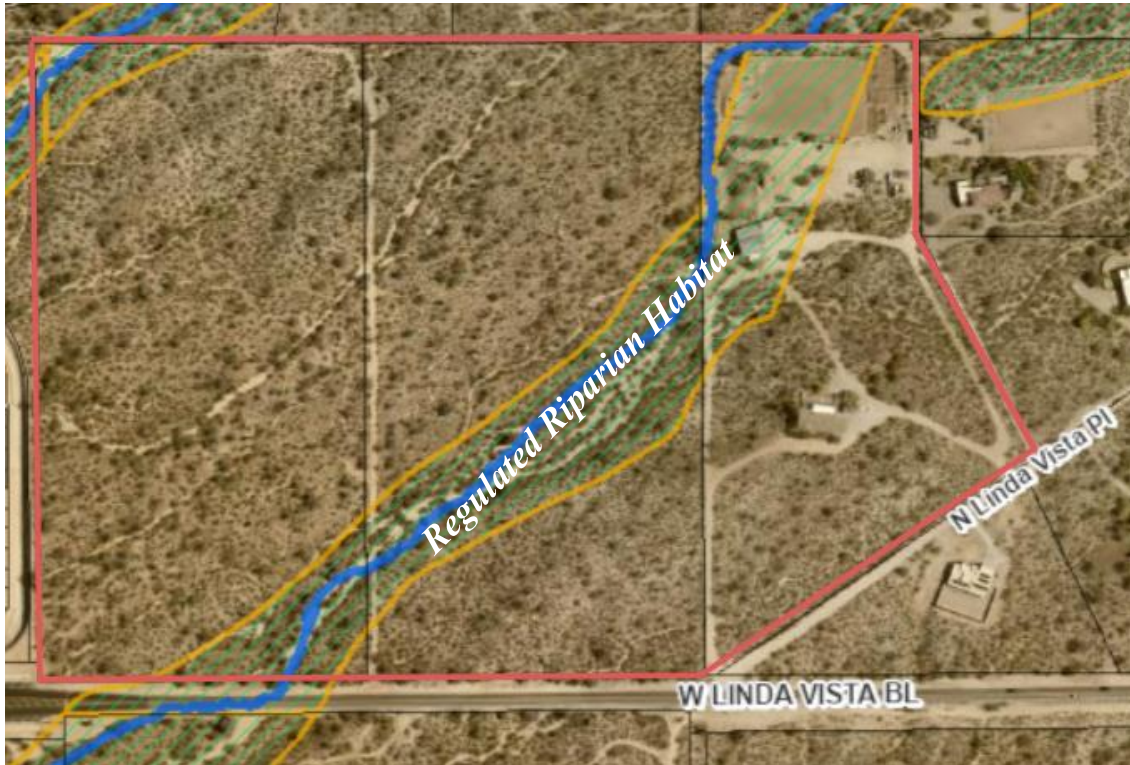
Regional Flood Control District

The Regional Flood Control District (District) staff have reviewed the parcels within the annexation boundary and offer the following comments:

1. Parcel 216-34-0670 is entirely located in a Federal Emergency Management Agency (FEMA) Special Flood Hazard Area (SFHA) Zone AO1 Alluvial Fan Floodplain. Approximately $\frac{3}{4}$ of parcel 216-34-0680 is mapped within the FEMA SFHA AO1 Alluvial Fan Floodplain and parcel 216-35-0690 is only impacted within the northwest portion with the same FEMA designation. Below is a screen capture of the boundary of the FEMA floodplain (blue hatching). If the area within the FEMA Floodplain is to be developed, elevation and erosion protection requirements will apply to ensure public health and safety during a 100-year storm event.



2. A local erosion hazard study, Tortolita Mountain Geomorphic Assessment, occurred in 1992 demonstrates the parcels are impacted by geomorphic soils and have erosive characteristics that require site specific erosion protective measures. If development occurs within the mapping, the engineering analysis should account for the erosive soil characteristics to protect the structures from scour.
3. Both regulatory washes are located within mapped Regulatory Riparian Habitat (RRH) which is protected under the Pima County Floodplain Management Ordinance (Ordinance). The classification of the RRH is a higher value habitat; Important Riparian Area (IRA) with an underlying classification of Xeroriparian Class C habitat (on screen capture below, green hatching indicates the RRH mapping). The Ordinance requires avoidance of the IRA Habitat, which is of particular importance when highly erosive soils are present. Development of these parcels should prioritize setting aside the regulatory washes and RRH as open space to maintain floodplain function, hydrologic integrity and to provide continuous open space corridors.



Recommendation

The priority of land development shall set aside the regulatory washes and riparian habitat as open space to maintain floodplain function, decrease erosion, and promote hydrologic integrity. Providing continuous open space corridors will provide a benefit and amenity for the surrounding community.

Sincerely,



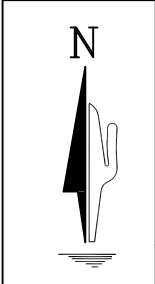
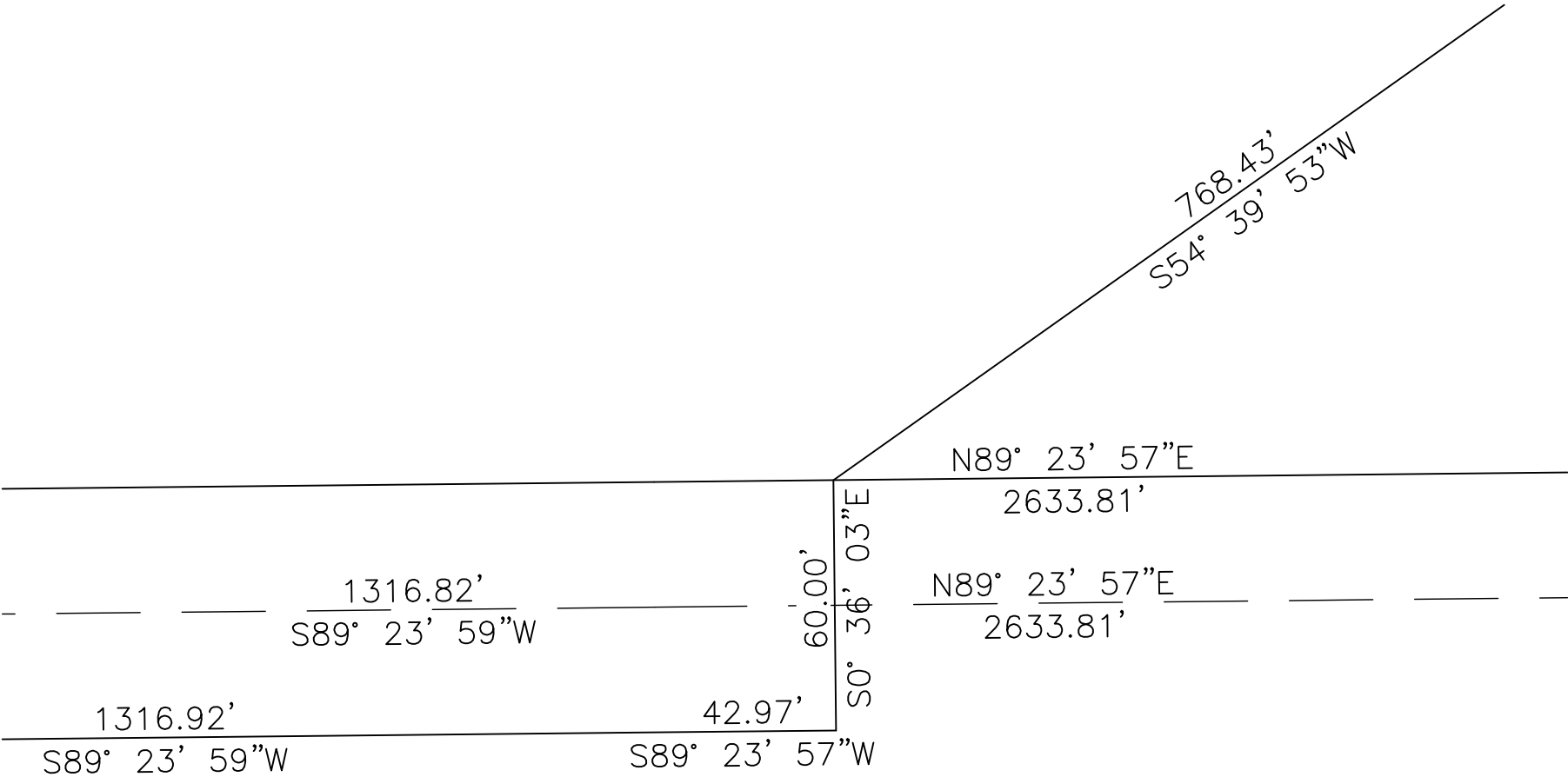
Mark Holden, AICP

Planner III

Pima County Development Services Department, Planning Division

c: Carmine DeBonis, Jr., Deputy County Administrator, County Administrator's Office
Diana Durazo, Senior Advisor, County Administrator's Office

DEPICTION OF EXHIBIT "A"



PIMA COUNTY SURVEY

LINDA VISTA – MARANA ANNEXATION
LOCATED IN SECTION 14, TOWNSHIP 12 SOUTH, RANGE 12 EAST,
GILA AND SALT RIVER MERIDIAN, PIMA COUNTY, ARIZONA