

Coalition for Sonoran Desert Protection

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AGENDA MATERIAL

DATE 12-16-25 ITEM NO. RA 13

Arizona Center for Law in
the Public Interest

Arizona Master Naturalist
Association

Arizona Native Plant Society

Arizona-Sonora Desert
Museum

Bat Conservation
International

Cascabel Conservation
Association

Center for Biological
Diversity

Center for Environmental
Ethics

DarkSky Southern Arizona

Defenders of Wildlife

Environmental Law Society

Friends of Ironwood Forest

Friends of Saguaro National
Park

Friends of Tortolita

Gates Pass Area
Neighborhood Association

Great Old Broads for
Wilderness - Tucson

Living Desert Alliance

Maricopa Bird Alliance

Native Seeds/SEARCH

Save the Scenic Santa Ritas

Sierra Club - Grand Canyon
Chapter

Sierra Club - Nopales Group

Sky Island Alliance

Tortolita Alliance

Tucson Bird Alliance

Tucson Herpetological
Society

Tucson Mountains
Association

Wildlands Network

December 15, 2025

Rex Scott, Chairman and District 1 Supervisor
Pima County Board of Supervisors
33 North Stone Avenue, 11th Floor
Tucson, AZ 85701-1207

**RE: Agenda item no. 13, ORDINANCE NO. 2025 - 32, creating a new Section 10.37
Unpaved County Roads, to regulate certain unpaved county roads to maintain health
standards for Air Quality.**

Dear Chair Scott and Members of the Board:

Founded in 1998, the Coalition for Sonoran Desert Protection is an alliance of 28 regional and national organizations that work together for the long-term conservation of Southern Arizona's Sonoran Desert.

We appreciate the opportunity to comment on Ordinance No. 2025-32 and we support the intent of this ordinance to address the real environmental and community impacts associated with intensive industrial use of unpaved county roads.

CSDP stands in solidarity with our coalition member Save the Scenic Santa Ritas and appreciates their leadership and analysis on this issue. But **while public discourse has focused on the Santa Rita Mountains area and the potential for impact to any future and approved Hudbay mining project, we want to be clear that this ordinance has countywide relevance.**

The issues it seeks to address — air quality degradation and negative impacts to sensitive landscapes, wildlife, and water sources — are issues we may face across Pima County if the industrial use (including, but not limited to, that of extractive industries) of unpaved county roads is not adequately monitored and controlled for.

This ordinance will provide important future protections wherever unpaved county roads face high-intensity use. From an environmental perspective, we emphasize that:

- Preventative dust control measures, as part of a comprehensive approach to protecting air quality, vegetation, wildlife, and nearby communities, are welcome. However, **preventative dust control measures are not a strong enough substitute for the ordinance itself.** In other words, dust mitigation measures — such as spraying roadways — cannot be used as a loophole to avoid limits intended to broadly protect the community and natural resources.

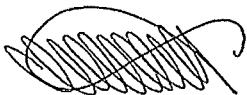
- We do *not* support an ordinance that relies primarily on speed limits as a mitigation strategy. Speed limits are highly unlikely to be enforced, and dust, noise, and other disturbances will not be addressed. **We support speed limit reductions as part of a proposed ordinance, but urge Pima County not to overly rely on them.**

We note that similar measures are used elsewhere, including in Arizona. Pinal County's Construction Fugitive Dust Rules, for example, impose limits on truck traffic on unpaved roads to 20 per day where other controls aren't, won't, or can't be met. And the City of Phoenix requires haul permits for specific projects that will result in heavy truck traffic; see City Code Sec. 36-88.07.

CSDP respectfully asks the Board to adopt an ordinance that provides meaningful, countywide protection for Pima County's environment, natural resources, and rural communities.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Hotten".

Kate Hotten
Co-Executive Director