



## Coalition for Sonoran Desert Protection

300 E. University Blvd., Suite 120  
Tucson, Arizona 85705  
p (520) 388-9925 • f (520) 791-7709  
www.sonorandesert.org

September 2, 2016

Arizona Center for Law  
in the Public Interest

Arizona League of Conservation  
Voters Education Fund

Arizona Native Plant Society

Bat Conservation International

Cascabel Conservation  
Association

Center for Biological Diversity

Center for Environmental  
Connections

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Drylands Institute

Empire Fagan Coalition

Environmental and Cultural  
Conservation Organization

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

Native Seeds/SEARCH

Neighborhood Coalition of  
Greater Tucson

Northwest Neighborhoods  
Alliance

Protect Land and  
Neighborhoods

Safford Peak Watershed  
Education Team

Save the Scenic Santa Ritas

Sierra Club–Grand Canyon  
Chapter

Sierra Club–Rincon Group

Silverbell Mountain Alliance

Sky Island Alliance

Sky Island Watch

Society for Ecological  
Restoration

Sonoran Arthropod  
Studies Institute

Sonoran Permaculture Guild

Southwestern Biological  
Institute

Tortolita Homeowners  
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

Women for Sustainable  
Technologies

Supervisor Sharon Bronson, Chair  
Pima County Board of Supervisors  
130 W. Congress St., 11<sup>th</sup> Floor  
Tucson, AZ 85701

**RE: P16RZ00005 Whisper Canyon Holdings, LLC – W. Hardy Rd. Rezoning**

Dear Chair Bronson and Supervisors:

Thank you for the opportunity to provide comments on the proposed rezoning for W. Hardy Road (P16RZ00005 Whisper Canyon Holdings, LLC – W. Hardy Rd. Rezoning).

This 19.81-acre parcel falls within the Conservation Lands System (CLS) of the Comprehensive Land Use Plan. The entire parcel has an underlying Multiple Use Management Area designation with a Special Species Management Area (SSMA) overlay throughout. There is also Important Riparian Area in the northern end of the property.

**The Coalition for Sonoran Desert Protection supports the applicant's proposal and the recommendation of the Planning and Zoning Commission to comply with CLS guidelines by using on-site conservation and off-site mitigation.** This includes approximately 7 acres of on-site conservation in the form of protected natural undisturbed open space (NOS) along with 45 acres of off-site mitigation.

We have also proposed to the owners that they consider deeding the NOS on-site to Pima County Regional Flood Control District (District) and the District consider accepting. This would provide consistent conservation ownership and management for the majority of the Hardy Wash.

Thank you again for the opportunity to comment. If you have any questions, please do not hesitate to contact me.

Sincerely,

Carolyn Campbell  
Director