



**CONSERVATION ACTION ALERT: Comments needed for Villages at Vigneto by ~~Nov. 4th~~
EXTENDED to December 4th 2017**

Ask the Army Corps to revoke Permit # 2003-00826-SDM, issued by the Los Angeles District on June 21, 2006.

[CLICK HERE](#) to submit your comment(s). This link will take you to our new online advocacy platform where you can: use our sample letter, edit it or write your own. Please pass along this link to anyone who might be interested in submitting comments.

Almost a decade ago, the Army Corps of Engineers granted a Clean Water Act permit for the Whetstone Ranch, a proposed 8,212-acre 20,000-residence development adjacent to the San Pedro River, near Benson, AZ. After extensive efforts by Tucson Audubon and our partners, the Army Corps of Engineers agreed to suspend the permit, effectively recognizing that it had been granted without a full environmental analysis, as required by the law. The U.S. Army Corps of Engineers is now seeking **public comments** to determine whether to revoke, modify or reinstate the Whetstone permit. This time the consequences are much greater as the permit would enable the development of a much larger development – the 12,817-acre 29,400 –unit “Villages at Vigneto” master planned community. Granting the permit would have a significant impact on the environment, including the outstanding San Pedro River and the species that depend on the river for habitat.

The proposed Villages at Vigneto development lies at the base of the Whetstone Mountains segment of the Coronado National Forest, near the Lower San Pedro River Global Important Bird Area (GIBA), the San Pedro Riparian National Conservation Area (SPRNCA) and GIBA, St. David Cienega, and the world-class wet cave system of Kartchner Caverns State Park. In addition, downstream from Vigneto are numerous important riparian mitigation properties located astride the San Pedro River. The sustainability of these vital conservation areas and tourist destinations relies upon sufficient water quantity and quality, including groundwater. In addition, the southern half of the Vigneto proposal is located in Arizona’s Wildlife Linkage Assessment Linkage #97 which was designated by the Arizona Department of Transportation as critical for habitat connectivity.

The proposed Villages at Vigneto development would fragment 12,817 acres (almost 20 square miles) of high desert grasslands and inter-braided washes. El Dorado Benson LLC proposes 29,400 new homes, golf courses, artificial lakes, Italianate non-native vegetation, shopping and recreation centers, and is intended to attract up to 70,000 new residents with a Tuscany in the desert theme. This population explosion would dramatically impact the environment surrounding Benson and significantly alter the San Pedro River watershed.

The Vigneto proposal has raised serious concerns from local area residents and scientists - a significant projected increase in ground water pumping would contribute to potable ground water depletion and could ultimately reduce surface water flows in the San Pedro River, putting the region's birds, biodiversity, water users, and economy at risk. Growing concerns over water security and pressing drought conditions throughout Arizona call into question the sustainability of a development such as the Villages at Vigneto, as currently configured.

Since 2006, newly listed federal endangered species that may be adversely impacted by Vigneto have been identified: Western yellow-billed cuckoos, Northern Mexican garter snakes, and one of the very few jaguars spotted in the United States, El Jefe, which was sighted in the Whetstone Mountains. The proposed design, configuration and non-native vegetative palette will disturb the Vigneto's hydrology and render it less functional for resident and migratory wildlife.

YOUR COMMENTS MAKE A DIFFERENCE:

- **The San Pedro River is the last free-flowing river in the desert southwest. It's watershed is the most biodiverse of any in the southwest, exceeding even the Middle Rio Grande.** (this statement should be inserted at the beginning of the alert) **Why is it important to you?**
- Comments will help "determine the need for a public hearing and to determine the overall public interest of the activity". A public hearing is not only important for public participation but also for understanding the full potential impact of this development which is unprecedented in both size and total units. **The current proposal is not in the public interest!**
- "Comments are used in the preparation of an environmental assessment and/or an environmental impact statement pursuant to the National Environmental Policy Act." Currently the developer is claiming NO NEED for an Environmental Impact Statement (EIS). This development would fundamentally change the landscape in this region. **Ask the Corps to require a full EIS!**
- "Comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors...". **Ask the Corps to consult with the U.S. Fish and Wildlife Service regarding potential impacts to, and mitigation for, any threatened or endangered species and critical habitat designations on the entire site and off-site.** The Corps has yet to do this despite **changed circumstances and new information** since the 2006 Permit including the expansion of the proposed project itself.
- Ephemeral and intermittent streams are critical to our region's hydrology. **Ask the Corps to consider direct, indirect and cumulative impacts to all 12,324 acres of the site AND potential off-site impacts resulting from the development.**
- "Any comments received will be considered by the Corps to determine whether to reinstate, modify, or **revoke the permit.**" Personalize your comments and **make YOUR voice heard!**

You can visit our website for more information on Villages at Vigneto and Tucson Audubon's involvement with this ongoing issue. [Click here.](#)

[CLICK HERE](#) to submit your letter.

Or email your comments directly to Kathleen.A.Tucker@usace.army.mil by December 4th, 2017.