



# Coalition for Sonoran Desert Protection

738 N. 5th Ave., Suite 205 Tucson, Arizona 85705  
520.388.9925 | [sonorandesert.org](http://sonorandesert.org)

Arizona Center for Law in  
the Public Interest  
Arizona Master Naturalist  
Association  
Arizona Native Plant Society  
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  
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

August 15, 2025

Mayor Regina Romero and City Council Members  
City of Tucson  
City Hall  
255 W. Alameda  
Tucson, AZ 85701

**RE: Agenda item number 8 on ORDINANCE NO. 12188**

Dear Mayor Romero and City Council Members Santa Cruz, Cunningham, Dahl,  
Lee, Perez, and Uhlich,

The Coalition for Sonoran Desert Protection writes in strong support of the City's proposed ordinance regarding large quantity water users.

We wish to suggest small updates that would further strengthen the ordinance. Specifically, we suggest:

1. a maximum demand limit, at which a project will not be considered;
2. more stringent requirements for users that hit a higher, defined, demand threshold;
3. that clause E.2. is amended to ensure stronger governance for ongoing management and compliance monitoring of a user's water conservation planning.

Finally, we support the City of Tucson's strong commitment to further ordinance updates related to data centers and resource-intensive development generally. We note that it is important to capture not just large quantity water users with this program, but also large load energy customers. We also note the importance of transparency and public input, which you have recognized, as this process takes place over the next several months.

Thank you for your leadership on this issue, and for expediting this process. We are available to discuss these comments and welcome the opportunity to provide input as you conduct further stakeholder outreach.

Sincerely,

Kate Hotten, Co-Executive Director