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# **WHO SAID WHAT?**

## Chapter Two

### Local Water Utilities and Jurisdictions

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# Local Water Utilities and Jurisdictions

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## SYNOPSIS

This chapter reviews oral and written comments submitted by water utilities and local jurisdictions. Local water utilities and jurisdictions are included in the same chapter because Marana and Oro Valley own and operate water utilities, as does Tucson. (As Exhibit 2-2 below shows, these three water utilities service 86% of the municipal water demand in the Tucson AMA.) When officials from the jurisdictions made comments, they presumably were speaking on behalf of the water utility as well. Having made this decision about Marana and Oro Valley, I felt it made further sense to include all local jurisdictions in this stakeholder category. Marcelino Flores, co-chair of the Oversight Committee, works for the Pascua Yaqui Tribe. Another committee member, Mark Stratton, is the director of Metro Water.

Fifteen participants in this category submitted twenty-five comments. Their comments focused on a call for a regional dialogue; water supply issues; concerns specific to the Town of Sahuarita; and a look at the future of water conservation.

## 2.1 PROFILE OF PARTICIPANTS

Exhibit 2-1 below identifies the participants and their organizational affiliations in the Local Municipal Water Utilities and Jurisdictions stakeholder category, as well as the number of meetings each attended and comments each submitted. The data shows that six water companies, three associations of water utilities, and five jurisdictions engaged with the Joint Study at some level. The towns of Marana and Oro Valley both own and operate water utilities, so their engagement could be included in either category – water provider or jurisdiction. The Town of Sahuarita operates a wastewater treatment and reclamation facility, but does not operate a water utility. Highlights of this data include:

- 1) Thirty individuals representing six water utilities, three water utility associations, and five jurisdictions participated in the Joint Study.
- 2) Fourteen representatives of these organizations submitted twenty-four comments: one technical presentation, twelve oral comments, and eleven written comments.
- 3) Twenty-six representatives of these organizations attended one or more meeting during Phases I and II. Sixteen representatives attended meetings without submitting comments.
- 4) The most actively engaged people were Val Little from Water CASA (attended twenty meetings and submitted four comments); Sheila Bowen from the Town of Sahuarita (attended twelve meetings); Dorothy O'Brien from the Town of Marana (attended seven meetings and made three comments); Philip Saletta from the Oro Value Water Utility (attended six meetings and submitted one comment); and Dave Crockett from Metro Water but representing the Southern Arizona Water Utilities Association (attended five meetings and submitted two comments).

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5) Seven people representing the Town of Marana participated in the Joint Study, four of whom submitted seven comments. The Town Manager, two successive Utilities Directors, and the General Manager of Public Works made these comments.

6) Six people representing the Town of Sahuarita participated in the Joint Study, with two representatives (the Mayor and Town Manager) submitting four comments.

**Exhibit 2 - 1- Participation by Local Water Utilities and Jurisdictions**

Organization	Representative	Make Comments				Attend Meetings
		Make Presentations	Oral Comments	Written Comments	Total Comments	
<b>Water Utilities</b>						
<b>Providers</b>						
Avra Valley Water Coop	Chris Ward				0	3
Cortaro Marana Irrigation District	Sydney Smith				0	1
FICO/FWC	Larry Kempton				0	8
Metro Water	Warren Tenney				0	1
	Michael Block				0	4
Oro Valley Water Utility	Philip Saletta			1	1	6
Vail Water Co.	Kip Volpe		1	1	2	3
<b>Associations</b>						
Southern Arizona Water Utilities Association	Dave Crockett		1	1	2	5
	Arturo Gabaldón		1		1	1
Water CASA	Val Little	1	2	1	4	20
Upper Santa Cruz Providers/Users	Ken Taylor		1		1	1
<b>Jurisdictions</b>						
Town of Marana	Michael Reuwsaat			1	1	
	Brad DeSpain		1	1	2	2
	Barbara Johnson		1		1	1
	Dorothy O'Brien		3		3	7
	Anthony Cuaron				0	1
	Rebecca Kunsberg				0	1
	Steve Romero				0	6

## Local Water Utilities and Jurisdictions

**Exhibit 2 – 1 continued**

Organization	Representative	Make Comments				Attend Meetings
		Make Presentations	Oral Comments	Written Comments	Total Comments	
<b>Jurisdictions</b>						
Town of Sahuarita	Lynne Skelton			1	1	
	Jim Stahle			3	3	
	Sheila Bowen				0	12
	Jesus Valdez				0	1
	Kathy Ward				0	7
	Monica Moxley-Wilson				0	8
Town of Oro Valley	David Andrews			1	1	
South Tucson	Walker Smith				0	1
Tohono O'odham Nation	Olivia Liston				0	1
	Phyllis Cachora				0	2
	Mary J. Lopez				0	1
	Wavalene Romero		1		1	3
	<b>Total</b>	<b>1</b>	<b>12</b>	<b>11</b>	<b>24</b>	

While the local water utilities and jurisdictions objected to not having a seat at the table,” the data in Exhibit 2 - 1 reveals a relatively robust involvement from these stakeholders.

### **PARTICIPATION BY LOCAL JURISDICTIONS**

In addition to the City of Tucson, there are four municipalities and two Indian tribes in Pima County. Marcelino Flores, a member and employee of the Pascua Yaqui Tribe, served as Co-Chair of the Oversight Committee. The Towns of Marana and Sahuarita participated extensively, through attendance at meetings and submission of comments. The Town of Oro Valley submitted comments.

### **PARTICIPATION BY LOCAL WATER UTILITIES**

At the September 24 2008 meeting, Jeff Tannler from the Tucson AMA office provided data showing there are one hundred and forty-five providers in the Tucson Active Management Area: twenty-six Large Providers pumping 250 acre-feet of water or more per year and one hundred and nineteen Small Providers pumping less than 250 acre-feet per year. There are approximately seventy-six hundred “exempt wells” with a capacity to pump 35 gallons or less per minute.

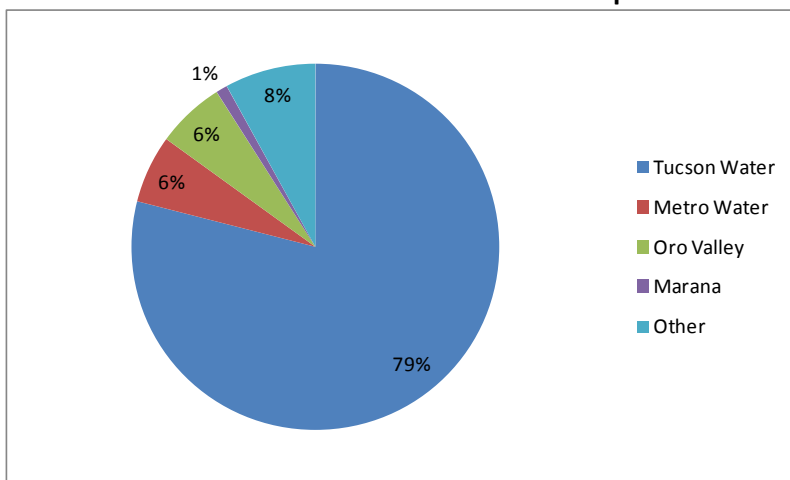
## Local Water Utilities and Jurisdictions

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In terms of number of water providers or holders of exempt well permits, participation in the Joint Study was not representative at all. When measured by percent of municipal water demand, however, participation in the Joint Study was fully representative. Exhibit 2-2 below reproduces a graph from a 2006 report prepared by Sharon Megdal from the University of Arizona Water Resource Research Center, showing the percent of water demand met by providers in the Tucson AMA.<sup>1</sup> (I assume Ms. Megdal did not include exempt wells in these calculations.)

This data documents that, in 2006, of the one hundred and forty-five large and small providers, Tucson Water accounted for 79% of water deliveries, while Metro Water and the Oro Valley Water Department each accounted for an additional 6% of deliveries. The remaining one hundred and forty-two providers, including the Town of Marana, accounted for the remaining 9% of municipal water demand in 2006.

**Exhibit 2 - 2 Water Provider Shares of 2006 Municipal Water Demand**



Mark Stratton, Executive Director of Metro Water, served on the Oversight Committee. Representatives of Avra Valley Water Co-op, Cortaro Marana Irrigation District, Farmers Water Company, Metro Water, and the Oro Valley Water Company attended one or more meetings. Kip Volpe from the Vail Water Company attended three meetings and submitted two comments.

Additionally, the three utility associations engaged with the Joint Study represent several of the water utilities in the region, with some providers having membership in all three associations (see Exhibit 2 - 3 below).

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<sup>1</sup> Megdal, Sharon and Mott Lacroix, Kelly, "Water Resource Availability for the Tucson Metropolitan Area, July 2006, at

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**Exhibit 2 - 3 Membership in Water Utility Associations**

Water Utility	Association		
	SAWUA	SCR/PUG	Water CASA
Avra Water Co-Op	×		
BKW Farms	×		
Community Water Company of Green Valley	×	×	×
Farmers Investment Company	×	×	
Flowing Wells Irrigation District	×		×
Green Valley Water Improvement District	×	×	
Kai Farms	×		
Town of Marana Municipal Water System	×		×
Metro Water District	×		×
Oro Valley Water Utility	×		×
Town of Sahuarita Wastewater	×	×	
Tucson Water	×		
BUREC			×
CAGRD			×
Town of Sahuarita			×

### **PARTICIPATION BY SEWAGE TREATMENT UTILITIES**

The Phase I report documents that Pima County Regional Wastewater Reclamation Department operates 97 percent of the sewage treatment capacity in Pima County. The Town of Sahuarita is the only other designated management agency for sewer services and participated actively in the Joint Study. The Town of Marana, which is seeking status as a designated management agency, participated extensively in the Joint Study. None of the twelve sewer service providers that are not designated management agencies participated in the Joint Study.

## 2.2 SUMMARY OF MAJOR THEMES

Thirteen representatives of local water utilities and jurisdictions submitted twenty-two comments. Their comments focused on four major themes:

- A. Call for a Regional Dialogue
- B. Focus on Water Supply Issues
- C. Town of Sahuarita Concerns
- D. A Look to the Future of Water Conservation

### A. Call for A Regional Dialogue

The water utilities and local jurisdictions objected to Phases I and II because only the city and county were in the dialogue. They objected to the conveners of the Joint Study, and only indirectly with the composition of the Oversight Committee. The water utilities and local jurisdictions maintained that a conversation about water that included only the city and county was inherently inappropriate and potentially harmful.

In two written comments, SAWUA argued that “members of SAWUA ... should be consulted before any decisions are made” and “all of the water utilities in Pima County should have first been brought together to develop a basis from which to proceed.” SAWUA wrote requesting “a seat at the table in any future regional water discussion”

From the Town of Marana, Mike Reuwsaat argued that Phases I and II “cannot be completed without the involvement of the other affected communities,” that waiting until after the first two phases to involve others will leave “little room for participation, comment or innovation.” Brad DeSpain wrote requesting, “the Committee panel representatives be reviewed to ensure equitable representation by all water and water reclamation facilities in the region.” Mr. DeSpain described what he heard as an offer from the Oversight Committee “to allow other regional partners ‘to become ‘members at the table’ not just ‘stakeholders.’” Mr. DeSpain argued, “a large part of a ‘sustainable water population’ will lie outside of the City water service area,” and that the “current committee ... should not presume to understand the politics which would yield appropriate ‘sustainable populations’ outside their area of expertise.” Dorothy Obrien explained the Town “wanted to have a seat at the table and not just be a stakeholder.”

Mayor Skelton from Sahuarita wrote, “One Council Member was adamant that outlying jurisdictions be brought to the table in Phase 2 and not wait until Phase 3.” Mayor Skelton complained that only the city and county were setting “policy and values” and that there was a lack of clarity in definition of critical terms like “region” or “metropolitan area.”

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Dave Andrews from the Town of Oro Valley objected because “when this study commenced jurisdictions were invited to attend any of the public meetings, but were in fact not invited to participate on the committee itself, in any form,” and that a request from SAWUA “to have a representative and participate on the committee” was rejected.

Val Little from Water CASA cautioned, “a strictly city-county venture such as this is feasible only in theory,” arguing instead that the city and county should expand the committee membership. Ms. Little worried that “a great opportunity will have been missed” if the Joint Study does not recognize and acknowledge “several regional water management efforts ... (that) already occurred or are ongoing.” SAWUA made a similar comment, “members of SAWUA talk together and cooperate on common issues,” arguing that we should “build on the cooperation and dialogue that already exists.” Mr. Andrews agreed: “Oro Valley – and our surrounding jurisdictions and partners – are engaged in a number of projects that demonstrate a commitment to regional planning and cooperation.”

Both Marana and Sahuarita spoke to their aspirations for degrees of self-sufficiency and autonomy. During the discussions on sustainability, Ms. O’Brien emphasized the town’s desire to design, build, and operate its own wastewater treatment plants, as well to put the effluent to the most beneficial use we can think of...” Ms. O’Brien declared Marana’s intention to provide “potable water services, wastewater treatment, and effluent” services to Marana residents.

Mr. Stahle wrote, the “Town of Sahuarita incorporated to ensure control of its own destiny, including its reclaimed water resources,” which is why it “owns and operates a wastewater and associated recharge facility within the Town.” This desire for autonomy drives the town’s opposition to regional water or wastewater utilities.

### **B. Focus on Water Supply Issues**

Some representatives objected to the scope on substantive grounds. SAWUA stated this most succinctly (1) “A detailed analysis of all infrastructure of each utility is unnecessary”; and (2) “the region’s water utilities know precisely what water resources they have access to. ... These facts are not unknown to the region’s water utilities and professional water managers.”

The water utilities preferred to focus on regional water discussion on water supply and management, deemphasizing other topics in the approved scope. SAWUA described its preferred focus, “when any of our members’ customers turn on the tap, there is water.” SAWUA described its proposal for a “voluntary nonprofit organization ... to find and secure additional water resources for the region and serve as a wholesale water provider to its members.” SAWUA spoke of a need for “the governing bodies (to) begin the conversation about how to obtain additional supplies from where, and at what cost.” SAWUA noted, “Each and every one of us has developed long-range projections of water demands and has developed plans to meet those demands.”

Mr. DeSpain emphasized the importance of focusing on water supply, referring to “providing safe water services to residents” and “ensuring adequate renewable resources for the region.” Noting

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efforts such as the ADD Water Program, which are “beginning to evaluate water supply and delivery options within Arizona,” Mr. DeSpain argued it is “in the best interests of the region to identify its concerns and have a unified voice.”

Ms. O’Brien noted, “sustainable (water) resources are key to the entire region ... to make sure that all of our resources are put to the best effective use possible.” Ms O’Brien referenced the town’s suit over ownership of the county’s wastewater treatment facility and the town’s aspiration for “putting the effluent to the most beneficial use we can think of, which is recharging it in most cases.” At the meeting in Phase II touching upon the ADD Water Program, Ms. O’Brien described SAWUA’s focus on and active involvement in ADD Water.

In his comments on cooperation among northwest side jurisdictions, Mr. Andrews spoke of their “commitment and cooperation, especially in the area of water management, conservation and the development of renewable water resources, such as reclaimed water and CAP water.”

Ken Taylor from the Santa Cruz River Providers and Users Group spoke of the water deficit in the Sahuarita and Green Valley area and the group’s “current priority (being) to bring CAP water to address” that deficit.

Water utilities stressed their expertise in water resource management, which they considered central to a regional discussion. SAWUA wrote, “When it comes to water the members of SAWUA are the experts who should be consulted with before any decisions are made.” SAWUA notes the water utilities “know precisely” what their water resources are; have “developed plans to meet those demands; and that ADWR “has aggregated this information across the region.”

Christopher Volpe, representing Vail Water Company, stressed the need for “fact based research,” “rationality,” and “reasonableness and balance” in our discussions, arguing we should focus on “likely scenarios that are sustainable ... and compatible with Pima County’s present inhabitants and future population growth.” Mr. Volpe preferred this substantive focus over what he characterized as “an irrational exuberance” shown by “some members of the audience,” warning the committee against being “unjustly influenced by pressure of the *en masse* special interest group” attending the meeting.

### **C. Town of Sahuarita Concerns**

Mayor Skelton noted that, while the town operates a wastewater treatment facility covering about 50% of its population, water service is provided by “six plus independent water companies of varying size.” Perhaps because of these facts, Sahuarita raised issues not raised by Marana or Oro Valley.

In a letter, Mayor Skelton raised three issues:

- (1) “Heavy use of groundwater by the mining industry should be addressed”;
- (2) “The issue of how water is priced needs to be discussed and potentially changed”; and

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(3) “While it is imperative for Southern Arizona to have a regional water strategy, water issues are also statewide issues, with local implications.” As examples of this third issue, Mayor Skelton noted (a) ADWR issues “100 year water assurances without dialogue with a local jurisdiction” and (b) “growth and apparent lack of focus on conservation in Maricopa (could have the effect of) increasing both cost and access for Southern Arizona residents.”

In his written comments, Jim Stahle endorsed a regional dialogue following upon completion of Phases I and II. This regional dialogue would address:

(1) “both water resource and land use planning”;

(2) “regional solutions to stormwater management that includes as much capture as possible without degrading the environment or other property”;

(3) “the availability of renewable water supplies ... in the development process”;

(4) “ensure recharge occurs within reasonable proximity to groundwater pumping”;

(5) “ensure groundwater ecosystems are protected.”

Mr. Stahle raised cautions about a regional dialogue as well:

(1) “the use of in-lieu mitigation (must not cause) destruction of riparian habitat ... in exchange for funding restoration elsewhere”;

(2) the town “strongly disagrees” with asking PAG to serve as the “regional entity”;

(3) efforts to “secure additional water supplies primarily reflect (the interests of) water utilities,” and not necessarily those of “various regional jurisdictions”; and,

(4) a regional dialogue “should not be construed as a mechanism to establish regional utilities for water and wastewater.”

### **D. A Look at the Future of Water Conservation**

Ms. Little works for an association largely comprised of water utilities, but with an exclusive focus on conservation. At the request of staff and the committee, Ms. Little presented a white paper on conservation during Phase II. Staff and committee asked Ms. Little not to critique current conservation efforts in the region, but to describe a range of conservation tools, provide some examples of conservation efforts elsewhere in the world, and to look forward at how conservation regionally might, or should, evolve.

Ms. Little sketched an expansive definition of conservation and a myriad of tools that many entities can use and already are using, including Tucson Water. I believe, however, Ms. Little posed significant challenges to water utilities and jurisdictions locally, including her own membership. For example, Ms. Little stated, “As long as it is cheaper in dollars, environmental and social terms to do

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increased conservation than to find the next source of water, we have more work to do. ... And, regionally, we need to make a conscious shift from a growth-based economy to one that is more sustainable; we have entered the uncharted waters of limits and drastically changing priorities.”

Ms. Little posed a challenge to water utilities of either changing their mindset and expertise, or changing the hierarchy of expertise within water utilities. Ms. Little wrote:

“One reason the efficiency programs are difficult for traditional water agencies to fully embrace is that they shift the burden from engineering logistics to social ones. Typically, water utilities are led by and, heavily comprised of, highly trained engineering experts who know how to design and build large structures and systems. These same experts are less familiar or comfortable with methods of designing and implementing conservation programs that reach individual customers.”

“Typically there is a disconnect between the conservation staff and the rest of the water resource team in many utilities. A corollary, there is often an even greater disconnect between the conservation folks and those who are the utility data ‘gatekeepers.’”

Ms. Little posed challenged water utilities to broaden their sense of what is possible. For example, Ms. Little pointed to the example of Queensland, Australia, which lowered their use to 33.8 gallons per capita per day and Melbourne, which set a goal of 41 gallons per capita per day. Another example is Beijing, China, where use is only 22 gallons per capita per day, the government is focused on eliminating “the huge losses within the system.” A third example is India, where “groundwater depletion is a major concern,” government is enacting laws “that make rainwater harvesting compulsory.”

Ms. Little made some predictions of water use policies of the future, such as not allowing potable water use for irrigation or toilet flushing; promulgation of new home standards that reduce use to 35 gallons per capita per day; and, enactment of ordinances requiring retrofitting of used homes to new home standards upon resale.

At a later meeting, Ms. Little recommended restructuring of water rate programs “because there shouldn’t be an increase in rates as a result of conserving water if your rates are structured in a different way.”

### 2.3. COMMENTS BY LOCAL WATER UTILITIES

Christopher Volpe and Philip Saletta made comments on behalf of water utilities, while three representatives of associations of water utilities made a number of comments. Eight representatives of local jurisdictions made comments. The comments stressed the need for a regional dialogue as well as the autonomy of the water utilities and jurisdictions. The preeminence of water supply issues was a second major theme, as was a look at the future of water conservation.

Comments by local water utilities and jurisdictions are presented in the following order.

- |       |  |       |                       |
|-------|--|-------|-----------------------|
| 2.3.1 | Vail Water Company                         | 2.4.1 | Town of Marana        |
| 2.3.2 | Southern Arizona Water Users Association   | 2.4.2 | Town of Sahuarita     |
| 2.3.3 | Oro Valley Water Utility                   | 2.4.3 | Town of Oro Valley    |
| 2.3.4 | Upper Santa Cruz Providers and Users Group | 2.4.4 | Tohono O’odham Nation |
| 2.3.5 | Water CASA                                 |       |                       |

#### 2.3.1 Vail Water Company, Christopher Volpe

During Phase 1.2, at the **June 25, 2008** meeting, Mr. Volpe asked Cliff Neal from the Central Arizona Groundwater Replenishment District, “I noticed on your chart, your bar chart, that while your obligation for future provisions for water has increased over the state, it looked like the Tucson AMA’s has actually shrunk, and what would be the cause of your future obligations shrinking in Tucson?”

On **October 10, 2008**, Mr. Volpe sent a letter to the committee. Mr. Volpe spoke of the need for “fact based research,” “rationality,” and “reasonableness and balance” in our discussions, which should focus on “likely scenarios that are sustainable, ecologically and economically, and are compatible with Pima County’s present inhabitants and future population growth.” Mr. Volpe contrasted this preferred approach against what he characterized as “an irrational exuberance” that he saw as characteristic of “some members of the audience” at committee meetings, warning against being “unjustly influenced by pressure of the *en masse* special interest group” attending the meetings.

Mr. Volpe spoke at the February 9, 2010 Mayor and Council public hearing, but there is no documentation of the comments he made.

#### 2.3.2 Southern Arizona Water Users Association, Dave Crockett and Arturo Gabaldon

Dave Crockett (Flowing Wells Irrigation District) and Arturo Gabaldon (Community Water Company of Green Valley) submitted comments on behalf of the Southern Arizona Water Users Association. Mr. Crockett and Mr. Gabaldon relayed SAWUA’s objections to their not having a “seat at the table of the joint study” and to the approved scope of work for the study. They submitted their comments in Phase 1.1 and Phase 1.2.

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## **Phase 1.1      *Getting Started***

Dave Crockett made oral comments at the **April 18, 2008** meeting, based on written comments dated April 17, 2008. Mr. Crockett noted, “When it comes to water, the members of SAWUA are the experts who should be consulted with before any decisions are made.” Mr. Crockett, noting that “the municipal water providers and agricultural water users who are members of SAWUA talk together and cooperate on common issues,” argued that we should “build on the cooperation and dialogue that already exists,” and closed his written comments with “we request a seat at the table in any future regional water discussions.”

Mr. Crockett dismissed was dismissive of the Joint Study scope for Phase I, especially concerning inventory and water resources documentation:

“Also, the region’s water providers know precisely what water resources they have access to. Each and every one of us has developed long-range projections of water demands and has developed plans to meet those demands. The Tucson Active Management Area has aggregated this information across the region and has developed plans to reduce and eventually eliminate the groundwater overdraft. These facts are not unknown to the region’s water providers and professional water managers.”

Instead, Mr. Crockett noted that SAWUA had a focus that “when any of our members’ customers turn on the tap, there is water.” Recently, “SAWUA recognized that the region as a whole should work cooperatively to ensure that enough water was available to the population we serve,” and “proposed a voluntary nonprofit organization be created ... to find and secure additional water resources for the region and serve as a wholesale water provider to its members.”

## **Phase 1.2      *Technical Presentations***

At the **July 9, 2008** meeting, Arturo Gabaldon, from the Community Water Company of Green Valley, presented a letter from the Southern Arizona Water Users Association, dated June 23, 2008. The letter made three points:

1.      Inventorying infrastructure is limited by homeland security concerns;
2.      SAWUA members “believe that all of the water providers in Pima County should have first been brought together to develop a basis from which to proceed and that at a minimum SAWUA should be included to represent the majority of water and wastewater providers in the region”: and,
3.      “A detailed analysis of all infrastructure of each utility is unnecessary,” and once the committee can “determine what population can be sustained with current supplies ... the governing bodies can begin the conversation about how to obtain additional supplies, from where, and at what cost.”

### 2.3.3 Oro Valley Water Utility, Philip Saletta

Mr. Saletta submitted an e-mail on February 3, 2010, during Phase 2.4. Mr. Saletta made general and specific comments.

#### General Comments

Mr. Saletta made three general comments.

1. Mr. Saletta wrote, “The recommendations in the report as we understand it only apply to the City of Tucson and Pima County. These recommendations should not apply to Oro Valley since there was no Oro Valley representation on the committee.” Mr. Saletta provided three examples of Oro Valley-specific issues not included in the Phase II report recommendations:

- a. Mr. Saletta addressed wastewater effluent and its utilization. Mr. Saletta wrote, “For example, Oro Valley has the second largest reclaimed water system in Pima County supplying approximately 2300 acre-feet per year for irrigation water. That is more than 20% of Oro Valley’s water deliveries to its customers. We also agree that going to Class A+ water quality for reclaimed water through better treatment of wastewater effluent is good environmental stewardship.”
- b. Mr. Saletta addressed water for environmental purposes, writing, “In our review we believe that some of the recommendations made regarding providing waster for environmental purposes should not impact Oro Valley’s water supply. Oro Valley supports improvement of our riparian areas but water has been set aside for this effluent in the Conservation Effluent Pool and should not directly impact Oro Valley’s wastewater effluent or other water supplies.” Mr. Saletta notes, “Wastewater is a valuable resource that Oro Valley owns and relies on for its reclaimed water system.” Mr. Saletta asks about water for environmental purposes, “How will it be paid for? Will it be part of water and sanitary sewer bills? Will there be a tax created?”
- c. Mr. Saletta raised the issue of the town’s potential annexation of the Arroyo Grande area. Regarding this annexation, Mr. Saletta wrote, “These Arroyo Grande lands have not been included in the growth model in the study and we agree with that approach. However, if annexed by Oro Valley, future water service in this area would be provided by Oro Valley Water Utility and wastewater service would be provided by Pima County Regional Wastewater Reclamation Department.

2. Regarding new water supplies, Mr. Saletta wrote, “Looking for new supplies such as the CAP ADD Water Program is also very important.

3. Regarding regional discussions in the future, Mr. Saletta wrote, “The report recommends proceeding with Phase 3 of the study which included a broader regional approach involving other water providers in Southern Arizona. Oro Valley Water Utility would participate in this study if supported by our Council. However, Phase 3 should not proceed unless there is an acceptable plan and process for adequate and fair representation for the participants.”

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## **Specific Comments**

Mr. Saletta forwarded thirty-one specific comments, primarily referencing recommendations in the Phase II report. Most of these specific recommendations provide more detail to the general comments addressed above. Two specific issues were not directly included in the general comments.

1. Mr. Saletta extended the Town's defense of its autonomy and authority to define limits for a regional discussion of water and wastewater. For example, regarding demand management recommendations (2.1, 2.2,), Mr. Saletta wrote, "Regional goals can be discussed and considered but should only be approved by the governing body that is responsible for each jurisdiction. One jurisdiction could not impose its goals on another." Mr. Saletta made the same comments about recommendation 3.1 regarding "water conservation regulations, landscape and building and zoning standards." Mr. Saletta wrote, "These are common elements for all jurisdictions, but each jurisdiction should have the authority to independently and individually approve and implement these types of regulations and standards."

Regarding recommendations (2.4) that the Pima Association of Governments assume a lead role in regional discussions, Mr. Saletta wrote, "Continuing to work through PAG for regional issues is fine, but each individual jurisdiction should remain in control of the areas within its individual boundaries. PAG should not be the final authority on growth and urban-form."

Later in his comments, Mr. Saletta wrote, "Another question is who will conduct the study. The Pima Association of Governments could possibly facilitate the Phase 3 study but the study should not be directly under the PAG Regional Council."

In addition, Mr. Saletta wrote, "The other question that needs to be answered is who will pay for the costs of the Phase 3 study. Participation in the study would be a burden on water providers for staff time and providing information."

2. Mr. Saletta expressed support for the "wheeling" of water resources included in recommendation 3.4. Mr. Saletta wrote, "The recommendation for wheeling of CAP is something we are also working on with Tucson Water and Metro. OVWU supports this approach."

## **2.3.4 Upper Santa Cruz Providers and Users Group, Ken Taylor**

During Phase 1.1, at the **April 18, 2008** meeting, Mr. Ken Taylor, from the Upper Santa Cruz Providers and Users Group, whose "areas of interest" include Sahuarita and Green Valley, identifies the "current priority (of his group) is to bring CAP water to address the area's water deficit." Mr. Taylor said his group "does not consider a 100 year water supply an adequate definition for the community's future – they hope to have an indefinite future."

## **2.3.5 Water Conservation Alliance of Southern Arizona, Val Little**

Water CASA is an association of water utilities, as well as the U.S. Bureau of Reclamation, the Central Arizona Groundwater Replenishment District, and the Town of Sahuarita, that focuses on water

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conservation awareness and innovation. Ms. Little made comments during Phase 1.1 calling for regionalizing participation in the study. In Phase 2.1, Ms. Little presented a “conservation white paper” at the request of staff and the committee at one meeting and at a second meeting urged revisions to water rate structures to encourage conservation.

### **Phase 1.1      *Getting Started***

During Phase 1.1, Val Little submitted written and oral comments at the **May 12, 2008** meeting. Little said, “a strictly city-county venture such as this is feasible only in theory.” Ms. Little said, “a great opportunity will have been missed” if the Joint Study does not recognize and acknowledge “several regional water management efforts ... (that) already occurred or are ongoing.” Ms. Little noted, “no entity in this region exists in a vacuum,” and “no entity has a bigger paddle” (than) ADWR. Ms. Little suggested (1) the Joint Study run Phases 1 and 3 and Phases 2 and 4 concurrently; (2) consider a technical advisory committee; and (3) expand the committee.

Ms. Little raised concern that inventorying critical water and wastewater infrastructure could conflict with Department of Homeland Security concerns about placing such infrastructure at risk.

### **Phase 2.1      *Technical Presentations***

At the request of staff and committee, Ms. Little presented a “Conservation White Paper” at the April 23, 2009 meeting. Ms. Little began her presentation with two observations:

1. In 1950 President Truman’s Water Resource Policy Commission concluded, “We can no longer be wasteful and careless in our attitude towards our water resources ... not only in the West ... but in every part of the country.”
2. A November 2003 Pacific Institute report on conservation concluded, “it is much cheaper to conserve water and encourage efficiency than to build new water supplies or even, in some cases, expand existing ones ...”

Ms. Little says water conservation can be called “demand management, increased efficiency, or plain old conservation,” but the term has a number of possible definitions:

- Socially beneficial reduction of water use or loss;
- Reduction of water use without decreasing services or life style;
- Economic efficiency, the level of conservation reached when the incremental cost of demand reduction equals the incremental cost of supply augmentation;
- Any action of technology that increases the productivity of water use; or,
- Reducing the amount of water needed to achieve a goal while still accomplishing the goal.

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Ms Little's presentation had five major sections.

1. Conservation Tools – Ms. Little discussed and provided examples of eight conservation tools available and being used:

- Public information/education
- Incentives
- Public policy (laws, regulations, ordinances)
- Rates
- Research/evaluation/analysis
- Technology/industry standards
- Reuse/recycling
- Leak detection

2. Efforts Elsewhere – Ms. Little provided examples of conservation efforts in Australia, China and India. Ms. Little acknowledges that while practices in **Australia** “may have limited transferability to our situation,” “they certainly can be considered the most water efficient users of any developed nation.” As an example, Ms Little cites the “Target 140 Campaign” in Queensland, which set a goal of 140 liters per capita per day (37 GPCD) that has been exceeded (current use is 33.8 GPCD). Melbourne has a goal of 41 GPCD. Several states in Australia now require rainfall-harvesting systems.

In **Beijing, China**, where per capita use is currently 22 GPCD, the government has a primary focus on stopping “the huge losses within systems.”

In **India**, “groundwater depletion is a major concern.” Ms. Little states that in India “the definition of rainwater harvesting is collecting rainwater on roofs of buildings and storing it underground as on-site recharge for later use (emphasis in the original).” Mr. Little says, “All over the country laws are being passed that make rainwater harvesting compulsory.”

3. Constraints/Barriers – Ms. Little sets forth “three steps (that) are required to move us toward a more water-efficient world.”

- “identify the potential for improving water use efficiency”;
- “honestly determine the institutional, economic, and technological barriers that impede these improvements”; and
- “the implementation of appropriate economic, educational and regulatory policies needed to remove the barriers and capture all available savings.”

Ms. Little observes, “One reason the efficiency programs are difficult for traditional water agencies to fully embrace is that they shift the burden from engineering logistics to social ones. Typically, water providers are led by highly trained engineering experts who know how to design and

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build large structures and systems. These same experts are less familiar or comfortable with methods of designing and implementing conservation programs that reach individual customers.”

Ms. Little further observes, “Typically there is a disconnect between the conservation staff and the rest of the water resource team in many utilities. A corollary, there is often an even greater disconnect between the conservation folks and those who are the utility data ‘gatekeepers.’”

Given these concerns, Ms. Little observes, (1) “Sustainable solutions are going to have to come from all of us”; and (2) “there is no one solution”; and (3) “there are no more quick, easy or cheap solutions.”

4. Demand projections – Ms. Little declares “It is a good bet that within 10 years, all outdoor use in this region will be exclusively from 3 sources: reclaimed water, harvested rain water and residential graywater.”

Ms. Little says the “EPA is developing a specification to label new homes that will be designed to reduce water consumption through efficient plumbing features, hot water delivery, appliances, landscape design, and irrigation systems.” Called “WaterSense,” Ms. Little says these new homes “will be designed and built to be about 20 percent more efficient” than current new homes, which will allow savings of “more than 10,000 gallons of water per year.”

Ms. Little presents “predictions for the future of water use in the United States” by the year 2020 made by Mary Ann Dickenson (head of the Alliance for Water Efficiency):

- “Water use in new homes will be down to 35 gpcd”;
- “No potable water will be allowed for irrigation or toilet flushing”;
- “When sold, existing homes will be required to be retrofitted to 100% of new home standards”;
- “There will be special water rates for EPA WaterSense homes”;
- “All homes will be equipped with a beacon device that will alert the homeowner if the household is approaching or exceeding its water use target or budget”; and,
- “There will be a dramatic increase in training and certification requirements for all those working in fields that use water.”

Ms. Little quotes an article from the March 2009 Atlantic Monthly, “How the Crash Will Reshape America”: “... in the heady days of the housing bubble some Sun Belt cities ... developed economies largely centered on real estate and construction,” which the author describes as a situation in which “Whole cities and metro regions became giant Ponzi schemes.” The author believes “at a minimum, these places will take a long, long time to regain the ground they’ve recently lost in local wealth and housing values. It’s not unthinkable that some of them could be in for an extended period of further decline,”

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Ms. Little says, “Though it is tempting to credit the recent downturn in water use throughout the region to conservation efforts,” there are other forces at play, such as the economic downturn cited above, as well as:

- “Reporting about the drought, the well-publicized potential for shortages in the Colorado River, and climate change ... has served as a region-wide de facto public awareness campaign”;
- “Publicity about the recent passage of ordinances requiring residential graywater plumbing and commercial rainwater harvesting in new construction has served to heighten interest in these strategies”; and,
- “Efficiency in new construction brings down average use, particularly in the period of rapid growth we have recently experienced.”

“Ms. Little observes, “This reduction in water use also points to a more elastic demand for water than was the previous conventional wisdom and, by extension, may mean our job of reducing water use in the future may be easier than expected.”

### 5. Recommendations & opportunities –

Ms. Little proposes a list of fourteen recommendations and opportunities for conservation on a regional scale.

- “Chart a path to full utilization of indirect potable reuse. Continuing to ignore wastewater as a future source of supply could cost our community hundreds of millions of dollars.”
- “Develop a plan to achieve the elimination of potable water for outdoor use in a five to ten year time frame.”
- “Institute retrofit upon resale ordinances as an equitable method to bring existing properties up to the water efficiency standards of new construction. Target among other things, toilets, hot water heaters, and irrigation systems.”
- “Establish water efficiency messaging and media campaigns on a regional basis.”
- “Strive for rate adjustments and ordinance development every year. Just as rate increases should be regular, adoption of increasingly stringent water use restrictions, coupled with incentives, should be done regularly ... and in increments that are meaningful to customers ...”
- “Embrace a requirement that by a certain date, all toilets sold and installed in this county be High Efficiency models rated 500 grams-per-flush or higher by MaP testing.”
- “Incorporate the concepts of STRUCTURED PLUMBING including trunk, branch and twig piping systems, and pipe installation into the plumbing code.
- “Fully enforce all the conservation requirements and ordinances already in place.”
- “Establish a method to implement consistent conservation and water related ordinances throughout the region.”
- “Institute additional training and certification requirements for the entire range of practitioners in water using fields.”
- “Analyze the outcomes of existing and previous efforts as a way to inform our next generation of efforts”

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- “In this region we have done all the cheap and easy things ... so everything done from here on must be justifiable fiscally, environmentally, and socially ... and weighed against any and all other engineered or acquisition solutions to water supply issues.”
- “Use each and every one of the tools discussed in this paper.”
- “Target areas of actual high inefficiency rather than just overall high water use.”

Ms. Little closes with this admonishment: “As long as it is cheaper in dollars, environmental and social terms to do increased conservation than to find the next source of water we have more work to do. ... And, regionally we need to make a conscious shift from a growth-based economy to one that is more sustainable, we have entered the uncharted waters of limits and drastically changing priorities. So we better pay attention and get busy.”

Ms. Little provided oral comments at the **May 21, 2009** meeting. During a presentation by city and county staff on conservation, discussion turned to the potential unintended consequence of successful water conservation programs driving up water rates as utilities seek to recapture revenues lost to reduce sales. Ms. Little comments on this potential consequence to say, “we’re going to see a different way of looking at rate making. ... I think we’re going to see our rate structure changing so that we will eliminate that rate increase as a result of saving water. You’ve got to redistribute your base charges and commodity charges and change that whole philosophy ... because there shouldn’t be an increase in rates as a result of conserving water if your rates are structured in a different way.”

### **2.4 COMMENTS MADE BY LOCAL JURISDICTIONS**

Four representatives of the Town of Marana, two representatives of the Town of Sahuarita, and one from the Town of Oro Valley submitted comments. These representatives stressed regional issues, including their dissatisfaction with not “having a seat at the table,” as well as their desire for autonomy and self-sufficiency. The Town of Sahuarita expressed unique concerns, probably arising from the town not operating a water utility.

#### **2.4.1 Town Of Marana, Mike Reuwsaat, Brad DeSpain, Barbara Johnson, and Dorothy O’Brien**

Mike Reuwsaat (Town Manager), Brad DeSpain (Utilities Director), Barbara Johnson (Public Works Director), and Dorothy O’Brien (Assistant Utilities Director) submitted comments on behalf of the Town of Marana. With the exception of Ms. O’Brien, the Town submitted its comments during Phase 1.1, Getting Started.

##### ***Phase 1.1 Getting Started***

Mike Reuwsaat submitted written comments dated **April 17, 2008**. In this comments, Mr. Reuwsaat raises three issues:

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1. Mr. Reuwsaat asks for a definition of the roles and responsibilities of each Oversight Committee member and of the term community. Mr. Reuwsaat thought these definitions would help understanding of the scope of the Joint Study and encourage the public to offer its expertise.
2. Mr. Reuwsaat recommended a “peer review mechanism” after the completion of each phase of the Joint Study, which could be conducted by “a sister city, outside of the region.” Mr. Reuwsaat maintains that peer review “is a proven mechanism to help ensure unbiased and constructive feedback culminating in a stronger product.”
3. Mr. Reuwsaat asks for broader representation from the region on the committee, noting “there are no representatives from the other incorporated communities and there are Native American Groups missing as well.” Mr. Reuwsaat states, “Surely the Phase I inventory and Phase II common set of water resource development and conservation goals cannot be complete without the involvement of the other affected communities.” Later Mr. Reuwsaat states “Phases IV and V also raise concern because the introduction of the affected communities is so late in the process that the policies, values and definitions of ‘sustainable’ and ‘livable’ are, for the most part, set with little room for participation, comment or innovation.”

**Barbara Johnson** spoke at the **April 18, 2008** meeting, relaying Mr. Reuwsaat’s concerns to the committee

In oral comments at the **April 9, 2008** meeting, Mr. DeSpain called the committee’s attention to the Central Arizona Project’s current planning process.

Mr. DeSpain submitted written comments, dated **May 28, 2008**. Mr. DeSpain wrote that Marana thought that at the May 21, 2008 committee meeting “an offer was extended to allow other regional partners to become ‘members at the table’ not just ‘stakeholders.’” Mr. DeSpain notes that “Providing safe water services within the Tucson Active Management Area (AMA) is the function of multiple water providers” and asks, “the Committee panel representatives be reviewed to ensure equitable representation by all water and water reclamation facilities in the region.” Noting the scope’s interest in defining a “sustainable water population,” Mr. DeSpain argues that, a “large part of the potential ‘sustainable water population’ will lie outside the City water service area,” and “the current committee does not represent these areas.” Mr. DeSpain argues, therefore, that the committee “should not presume to understand the politics which would yield appropriate ‘sustainable populations’ outside their area of jurisdiction.” Mr. DeSpain wants increased communication between the City and County extended to the “remaining jurisdictions which discharge wastewater to Pima County and have paid for capacity within its Water Reclamation Facilities.” Mr. DeSpain wants increased communication extended to “a mutually constructed recharge basin” and to any intergovernmental agreements that “are modified or updated.”

Arguing that it did not focus on the essential water supply issues, Mr. DeSpain makes a similar argument about scope, referring to “providing safe water services to residents” and “ensuring adequate

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renewable resources for the region is critical to maintaining the standard of living each community resident has come to expect.” Mr. DeSpain notes that “Various organizations are beginning to evaluate water supply and delivery options within Arizona” and it is, therefore “in the best interests of the region to identify its concerns and have a unified voice at the various meetings to protect regional water supplies.

Mr. DeSpain raised concern that inventorying critical water and wastewater infrastructure could conflict with Department of Homeland Security concerns about placing such infrastructure at risk.

Dorothy O’Brien submitted the one oral comment at the June 11, 2008 meeting. Ms. O’Brien addressed the committee about the importance of regional planning and noted that a Superior Court judge had recently ruled in favor of the Town in its suit over wastewater. Ms. O’Brien said the Town wanted to have a seat at the table and not just be a stakeholder.

### ***Phase 1.3 Sustainability Discussions***

Dorothy O’Brien, Town of Marana, provided oral comments at the October 29, 2008 sustainability session. Ms. O’Brien first noted Marana’s intention to become a “Designated Management Agency, which means that we will have the opportunity to design wastewater treatment plants, build them, and treat wastewater, as well as putting the effluent to the **most beneficial use that we can think of, which is recharging it in most cases.**” (Emphasis added) As Ms. O’Brien noted, Marana intends to provide “potable water services, wastewater treatment, and effluent” services to Marana residents.

Ms. O’Brien then noted, “sustainable resources are key to the entire region ... to make sure that all of our water resources are put to the best effective use possible.” Ms. O’Brien said Marana hoped “that the group had opened up a little bit more ... not just Pima County and Tucson,” recommending that staff and the committee look “at the members of the Southern Arizona Water Users Association ... selecting some individuals from that group to move forward to assist in future planning processes.”

### ***Phase 2.1 Technical Presentations***

Dorothy O’Brien made comments at the September 17, 2009 committee meeting, during a discussion revisiting technical information on water resources and the ADD Water Program generated during Phase I. In her comments, Ms. O’Brien noted that the Southern Arizona Water Users Association discusses the ADD Water Program at its meetings and that several members of SAWUA are “on the Hammer It Out (HIO) group for the ADD Water process.” Ms. O’Brien noted it is difficult to “equate representation from Tucson to that of Phoenix as the needs of Tucson are very different from Phoenix.” Ms. O’Brien noted, “people from outside the three county area have also begun attending the HIO group meetings.” Ms. O’Brien said there was a goal to present ADD Water to the CAWCD board in January 2010.

### **2.4.2 Town Of Sahuarita, Mayor Lynne Skelton and Jim Stahle**

Mayor Lynne Skelton and Town Manager Jim Stahle provided written comments during the Joint Study. Their comments stressed concerns that were unique to the Town, reflecting that the Town is not

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a water utility. Their comments also stressed the Town's commitment to its autonomy and self-sufficiency.

### **Phase 1.4 Report Writing**

Mayor Skelton submitted her comments during Phase 1.4, Report Writing. At the invitation of the Town of Sahuarita, staff made a presentation to Mayor and Council at their meeting of February 9, 2009. After this presentation, Sahuarita Mayor Lynne Skelton submitted written comments setting forth the Town's "more formal input on Phase 1," dated **February 17, 2009**. Mayor Skelton notes that the Town does operate a wastewater treatment facility, covering about 50% of the town's population, and the Town did respond to the questionnaire sent out by staff and the committee requesting information on the facility. Mayor Skelton noted, however, that water service is provided by "six plus independent water companies of varying size, who "indicated to us they do not feel they have a clear understanding regarding how this information will be used by the City and the County." Mayor Skelton noted that "perhaps the data requested was not pertinent to the goals of the committee and, therefore, not as meaningful as intended."

Mayor Skelton then identified four specific issues of concern to the Town.

1. Mayor Skelton notes, "One Council Member was adamant that outlying jurisdictions be brought to the table in Phase 2 and not wait until Phase 3." The letter addresses concerns about "policy and values" being set only by the City and County and a lack of clarity about how the approved scope of work defines terms like "region" and "metropolitan area."
2. The Town argues, "Heavy use of groundwater by the mining industry should be addressed, particularly when this heavy use can eliminate direct human use." The letter notes that ASARCO is using CAP water and raises several issues related to the proposed Rosemont Mine and its use of CAP water versus groundwater.
3. The Town believes that "The issue of how water is priced needs to be discussed and potentially changed. Currently, pricing is based on the cost of delivery, ignoring the 'value' of water that should be reflected in the price."
4. Finally, the Town argues that "While it is imperative for Southern Arizona to have a regional water strategy, water issues are also statewide issues, with local implications." One example of a statewide/local implication issue arises when "ADWR issues 100 year water assurances without dialogue with a local jurisdiction regarding potential impact on local water planning strategy," and asks for "improved coordination between ADWR and local jurisdictions." A second example of a statewide/local impact issue is "the perception of many in Southern Arizona (is) that the growth and apparent lack of focus on conservation in Maricopa County" ... (which might have the effect of "increasing both cost and access for Southern Arizona residents."

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### **Phase 2.2 Report Writing and Phase 2.3 Public Hearing**

The Town of Sahuarita submitted two written comments from its Manager, James Stahle, during Phase II; the first by e-mail on **December 1, 2009** addressing the draft report and the second, by letter, on **February 8, 2010**, during the Mayor and Council's extended public comment period.

In both of his written comments, Mr. Stahle addresses the need for and requirements of a regional dialogue that should follow upon completion of the Joint Study's Phases I and II. For this regional dialogue to occur, the Town of Sahuarita "agrees the goal of a regional dialogue for both water resource and land use planning would achieve greater participation if the effort were convened by a regional entity." The Town also agrees with the recommendation that "the City and County should continue to work with PAG to do growth and urban form modeling on a regional level," and says it believes "a regional process would be beneficial and should include all jurisdictions."

Regarding the hydrological disconnect between where water is pumped and where it is being replenished," the Town "agrees we need regional solutions to stormwater management that include as much capture as possible without degrading the environment or other property." Further, "The Town agrees the availability of renewable water supplies should be considered in the development process and believes a regional approach is needed to ensure recharge occurs within reasonable proximity to groundwater pumping and to ensure groundwater dependent ecosystems are protected." Finally, the Town maintains water resources planning on a regional basis will help to "develop a more complete perspective of the current and future availability of groundwater and other water resources."

The Town, however, raises some cautions. Regarding protection of riparian areas, the Town argues, "the use of in-lieu mitigation must be well-thought-out, structured and prioritized on a regional basis to ensure destruction of riparian habitat does not occur in exchange for funding restoration elsewhere."

The Town "strongly disagrees" with the idea of asking the Pima Association of Governments to serve as the "regional entity" to convene the regional dialogue it wishes to see. Sahuarita believes that "ongoing PAG activities, including the RTA" makes it inappropriate as a convener of a regional dialogue on water. Furthermore, Sahuarita notes that PAG "does not represent the numerous water and wastewater providers in the region."

Sahuarita notes the involvement of SAWUA in the ADD Water Program, yet while "the process is encouraging, efforts to secure additional water supplies primarily reflect those of water providers, mining industries, SRP, CAP and others," not necessarily those of "the various regional jurisdictions." Mr. Stahle suggests formation of a committee of those interests "whose focus should be that of acquiring additional water supplies for the region."

Finally, Mr. Stahle notes that the "Town of Sahuarita incorporated to ensure control of its own destiny, including its reclaimed water resources," which is why it "owns and operates a wastewater and associated recharge facility within the Town." Therefore, while a regional dialogue "would be beneficial

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to water resource management and planning, this should not be construed as a mechanism to establish regional utilities for water and wastewater.”

### **2.4.3 Town of Oro Valley, Dave Andrews**

During Phase 1.4, Report Writing, on **January 28, 2009**, Dave Andrews, Oro Valley Town Manager, sent a letter addressed to the committee chair objecting to comments in a January 24, 2009 *Arizona Daily Star* editorial titled “Time for regional jurisdictions to join water talks.” Mr. Andrews objected to “insinuations (in the Star editorial) that jurisdictions were not interested in participating in the process,” an insinuation he argues is “simply not true.”

Mr. Andrews notes, “When this study commenced, jurisdictions were invited to attend any of the public meetings, but were in fact not invited to participate on the committee itself, in any form.” Mr. Andrews notes the Southern Arizona Water Users Association request “to have a representative and participate on the committee” was rejected by the committee. . Mr. Andrews commented “with the exception of one mailing to our Water utility Department, at no time was input sought from Oro Valley or other jurisdictions,” characterizing a statement in the editorial attributed to the committee chair that “they don’t like the process, so they won’t participate in the substance” as “a completely false statement under these circumstances.”

Mr. Andrews noted Phillip Saletta, the Water Utility Director, “did attend several of the committee meetings.” Finally, Mr. Andrews comments, “Oro Valley – and our surrounding jurisdictions and partners – are engaged in a number of projects that demonstrate a commitment to regional planning and cooperation, especially in the area of water management, conservation and the development of renewable water resources, such as reclaimed water and CAP water.”

### **2.4.4 Tohono O’odham Nation, Wavalene Romero**

Wavalene Romero, Legislative Representative for the Tohono O’odham Nation, expressed her appreciation to Ms. Seacat for forwarding the meeting notice. The Tohono O’odham Nation appreciates being included, and would like early notice of the meetings. Ms. Romero expressed the Nation’s appreciation for the efforts of the Oversight Committee.