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To: info@tucsonpimawaterstudy.com
Subject: Comments on Water study

Not scientific enough? Forget the science.... Many of the practices of Pima County Wastewater, Flood Control, and Tucson Water are not even logical! One theme is prevalent; each entity wants to control. And you know, that would not be a bad thing, if they wanted to do the best for everyone equally.

I do hope you have the time to read my lengthy comments to the Committee on Dec. 1, 2009

<http://www.g-a-l.info/Study-Comments.htm>

Further, I gave a presentation to the committee regarding stormwater on

<http://www.tucsonpimawaterstudy.com/Reports/FinalReport/Ch/Chapter13/101508transcriptnancyfreeman.pdf>

However, for busy people, here is a summary of key points:

Pima County Wastewater creates disconnect:

Pima County approves developments with no public water company available, so that small private water companies dot the landscape. Then the County takes their wastewater to Roger and Ina Rd., so it is not available to the people who produced it.

Pima County is now spending millions for the biggest, best treatment plants because they say, "It is mandated." It is true that it is

mandated that they stop violating the Clean Water Act, but it is not true that they have to build the biggest plants possible, only the best.

They will not do the figures on the creation of small satellite plants where the effluent can be used nearby instead of pumping groundwater. The County is spending \$25 million for a pipeline between Roger and Ina Rd. plants because Roger Road is overflowing. Would it be logical to put that \$25 million into creating a satellite plant in a region where the effluent can be used? And please note, it is a general principle that the groundwater levels are lower in the outskirts of the basin.

So the fact is that the majority of effluent goes to Roger and Ina Rd. instead of being used on the schools, golf courses and public landscapes in the outskirts of town where it was created. Then it is too expensive to pump it back out from whence it came; this is the reason that not even half the 63 golf courses in Pima County use effluent. Therefore, the suburbanites are paying for wastewater treatment they will never benefit from. Further, all City of Tucson residents are paying wastewater fees to Pima County without ever questioning if they are using the best practices for all.

Flood Control refuses to conserve and use stormwater:

Pima County is a place where it rains a lot all at once.... It's been doing that for how long? And what have the Pima County Flood Control with its 83 employees and \$58 million dollar budget (2009) done? In 2008 - 2009, they contracted out a Lee Moore Wash study-not with the intent of doing anything about the horrific flooding in the region. They wanted a map showing the sheet flood zones, so that anyone who built in that region would have to sign a covenant that the County would not be liable for any flood damage. They need to do this because they continue to permit developments that will impact downstream residences. Further, the million dollars was an unnecessary expenditure because the maps on their own database are more detailed, showing exact stormwater flows and depths.

At Sahuarita Highlands, Eric Shepp, a supposed hydrologist for Pima County, said that the development "had not created much more water downstream".... What science? The County had had the developer raise the land level two feet over some 10 acres to keep the sheet flow from entering the development ... and that did not create more water in the adjacent wash? Forget the science. Where's the logic? There is a county ordinance that the water be measured and more water does not go out of the development than came into it. That is never done. When there is a complaint, if anything is done at all, it is to write a "no-action" letter. Susanne Shields said that it was not worthwhile to conserve the stormwater, it would not make that much difference in the water table.... When did they try it and measure results?

Riverside County has been doing it since 1954 with great results. In Pima County, stormwater ruins private property and public infrastructure, while in Riverside County (and many other places) they "save such waters for beneficial use."

Riverside County Flood Control and Water Conservation District

<http://www.floodcontrol.co.riverside.ca.us>

Mission Statement: "The mission of the Riverside County Flood Control and Water Conservation District is to protect people, property and watersheds from damage or destruction from flood and storm waters and to conserve, reclaim and save such waters for beneficial use."

--Warren D. "Dusty" Williams, General Manager-Chief Engineer

Then there is Tucson Water. They would love to be the water company of the world, but are they doing the best for the majority of the people. They dried up the Tohono O'odham Nation lands with their wells along I-19 and continued to create small pumping stations all over the County-out of their service area. A recent Water Report from the

Director stated "the water levels are rising." Examine the science closely-they are rising in central Tucson where they stopped pumping, and in Avra Valley where they are recharging CAP water, which is a totally a separate basin from Tucson Basin. They plan to stop pumping groundwater in 2050... except in a few outlying areas, but how much will they pump between now and then? How much will the basin levels go down?

Corporation Commission-- Obstacle to sound water management in Pima County:

The Corporation Commission's rules mandate that they cannot allow a private water company to collect funds for needed infrastructure. For example, in 1985, two Green Valley water companies bought CAP allocations; however, there was no conveyance infrastructure. If the water companies had been charging a small fee for the past 25 years, the Green Valley residents would now have a pipeline and delivery of the CAP water to augment their depleting aquifer. Instead, they have paid out a couple of million for the CAP contracts over the 25 years and have received nothing-and are no closer to having delivery of the CAP water. Is the Commission concerned? Not at all, as a matter of fact, at the last Community Water hearing, they questioned why Community Water didn't just give up their allocations. This practice is like not repairing a roof because one does not want to get a loan-so the situation gets worse and worse.

New development pays Impact Fees in Maricopa County:

Some municipalities are now charging an impact fee (Water Resources Acquisition Fee) up to \$3,000 per home, but not to exceed 1% of the value of the home. Municipalities in Maricopa County have these fees since 1990. It sure didn't stop their development, and give them some funds to build water infrastructure. This practice could help the realistic concern among Tucsonans for paying for new development.

<http://www.mag.maricopa.gov/pdf/cms.resource/Development-Impact-Fees.pdf>

<http://ag.arizona.edu/AZWATER/awr/mar96/feature1.html>

Conclusion: I know you will think, "there is not a thing we can do about Pima County," but you owe it to the Tucson city taxpayers to do something. Whether you accept the study or not, there is much to be done-who will do it?

Thanks,
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