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Sent: Wednesday, February 03, 2010 2:43 PM
To: 'info@tucsonpimawaterstudy.com'
Cc: Loomis, Paul; Garner, William; Carter, Kenneth; Gillaspie, Barry;
Kunisch, Al; Latas, Salette; Spoerl, Pat; Watson, Jerene; Lemos, Stacey;
Davis, Mary
Subject: Water Infrastructure, Supply & Planning Study

Please find the attached specific comments from Oro Valley Water Utility regarding the City of Tucson/Pima County Water and Wastewater Infrastructure, Supply and Planning Study- Phase 2. We appreciate the opportunity to comment and the City Council of Tucson allowing more time for comments. Please see the attached specific comments in the attached document.

There are numerous areas of the study that reflect many of the challenges that are currently being addressed by the City of Tucson and Pima County. These same challenges are being met by other water providers in the region also. 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.

Oro Valley supports many of the recommendations and is in fact implementing action similar to what has been recommended. For example, Oro Valley has the second largest reclaimed water system in Pima County supplying approximately 2300 acre-feet per year for irrigation water. This 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. Looking for new supplies such as the CAP ADD Water process is also very important.

In our review we believe that some of the recommendations made regarding providing water 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 in the Conservation Pool and should not directly impact Oro Valley's wastewater effluent or other water supplies. Wastewater effluent is a valuable resource that Oro Valley owns and relies on for its reclaimed water system. In addition, if water is to be used for riparian areas or other environmental purposes, how will it be paid for? Will it be part of water and sanitary sewer bills? Will there be a tax created?

Oro Valley has been involved in discussions regarding the annexation of the Arroyo Grande area. Pima County is familiar with the Conceptual Plan that was prepared in conjunction with Arizona State Lands. 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.

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.

The above are general comments regarding the study and please also review the attached specific comments. Again, thank you for this opportunity to comment. If you have any questions, please let me know.

Sincerely,
Philip C. Saletta, P.E.
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Oro Valley Water Utility (OVWU) Comments (2/3/10)

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Comprehensive Integrated Planning

2.3 & 2.4 – These growth scenarios do not include Arroyo Grande and should not so long as there are discussions for annexation to the Town of Oro Valley (TOV).

3.1 – Will WR Planning occur in OVWU Service area?

3.4 – Wheeling is appropriate and we support.

3.5 – Will regional solutions include or impact TOV?

4.1 – Does this mean increased water and wastewater impact fees?

Respect for the Environment

3.1 – We must be assured that this would not affect our existing IGA with TW for reclaimed water.

3.1 – We must be assured that this would not affect TOV's Stormwater Utility

4.1 – We must be assured that this would not affect TOV's recharge credits under the Lower Santa Cruz River Managed In-Channel (LSCRMIC) Recharge Project. It should also be considered to allow members of the LSCRMIC Recharge Project to get a similar credit.

Water Supply

1.1 – OVWU supports the ADD Water Project.

2.4 – OVWU supports additional use of reclaimed water so long as the quality and quantity of reclaimed water under our IGA is protected.

- 3.2 – OVWU fully supports Class A+ reclaimed water.
- 4.4 – OVWU does not implement or support the idea of reclaimed water for residential use at this time.
- 4.7 – OVWU supports large irrigated or industrial use of reclaimed water.

Demand Management

- 2.1 & 2.2 – 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.
- 3.1 – OVWU is a leader in water conservation and would support this as approved by TOV Council.
- 5.1 – TOV has ordinances in place for passive rain water harvesting for new development.

General Questions

There are a significant amount of residences within the Oro Valley Town boundaries that are served by Tucson Water. How will these residences be affected by these recommendations?

All TOV residences are served by Pima County Wastewater Reclamation Department, how do these recommendations impact these residences?

TOV residents should not be adversely impacted by the implementation of these recommendations.

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Recommendations

Most of these recommendations are in place for TOV through its Planning and Zoning approval process.

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Recommendations

These recommendations apply to areas within or adjacent to the Tucson City limits and do not (and should not) apply to areas within TOV.

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2.4 - 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.

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These recommendations indicate that they should apply only to Tucson and the unincorporated areas of Pima County. Implementation of these recommendations should not impact other jurisdictions.

3.4 The recommendation for wheeling of CAP is something we are also working on with Tucson Water and Metro. OVWU supports this approach.

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4.2 – Any Lower Santa Cruz River (LSCR) Management Plan should not impact the current LSCR Managed In-Channel Recharge Project. Any water used for environmental purposes should be from water owned by Pima County or Tucson Water. None of the effluent owned by Oro Valley should be used for these purposes. Oro Valley has an extensive reclaimed water system and needs its wastewater effluent for this purpose or for long-term storage credits for replacing groundwater use.

In addition, the costs of such programs are expensive. How will the water be paid for if needed to be purchased? What would be the cost impact on Pima County Wastewater taxes and/or wastewater bills?

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1.1 – The ADD Water Project by CAP should be supported and continue.

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2.1-2.6 - These are all good recommendations.

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4.5 – Expansion of the reclaimed system is fine so long as it does not impact TOV's existing Reclaimed Water IGA with Tucson Water and TOV's ownership of wastewater effluent.

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1.1 – The recommendation states the City and County should partner with other stakeholders to identify patterns of use and conservation. Providing this information should be voluntary and not cause a burden to the stakeholder or water provider. They should be aware of how this information would be used.

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2.1 – The recommendation discusses working with other water providers regarding developing common goals for water conservation. It recommends a regional process. This would be fine so long as each entity was represented on any future committee or panel that may be formed.

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3.1 – This recommendation also discusses working with stakeholders regarding water conservation regulations, landscape and building and zoning standards. 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.

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4.1 – Again regional stakeholders have been discussed in this case regarding a public opinion survey. Any survey should be limited to the Tucson Water Service Area boundary. If other water providers choose to participate, it should be after formal review of the survey.

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Oversight Committee Conclusions

In general, we support the recommendations in this section regarding future phases. The recommendations pertain to regional involvement and additional studies and information from other stakeholders and water providers. However, Phase 3 should **not** continue unless there is an acceptable plan for representing all regional water providers.

The main issue here is will TOV or OVWU be involved and also have representation. In the previous process Tucson and Pima County focused on issues pertinent to their coincident water and wastewater service areas. It did not extend beyond those areas served by both Tucson Water and Pima County Wastewater Reclamation Department. As the study moves beyond Phase 1 and 2 studies and has a larger regional approach, then the study needs to not only involve those other water and/or wastewater service providers, but also develop a process that has adequate and fair representation.

At the outset of the Tucson/Pima County study, we asked through the Southern Arizona Water Users Association to participate and have a seat at the table, but instead only representatives appointed by the City of Tucson and Pima County were on the Oversight Committee. Oro Valley is willing to participate if we have a voice and vote in the process.

Another question is who will conduct the study. The Pima Association of Governments Staff could possibly facilitate the Phase 3 Study but the study should not be directly under the PAG Regional Council.

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 put a burden on water providers for staff time and providing information.

Again, Phase 3 should not move forward until an acceptable plan is developed for adequate and fair representation.