

Sent: Wednesday, February 03, 2010 2:11 PM

To: info@tucsonpimawaterstudy.com

Subject: E-mail from TucsonPimaWaterStudy.com - Comments

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Comments/Questions: As a member of the Joint City/County Water Study, I applaud Mayor & Council's recent decision to delay approval of the Phase II Report until the elected leadership and the community have a better understanding of the policy direction provided in the document.

During the final Committee meetings, I consistently voiced concerns about specific areas of Staff's report that I believed (and still believe) needed more attention prior to adoption. I did not vote to support the document as is, but I feel there are several strong policy recommendations in the Phase II Report: 1) working collaboratively as a region to acquire additional water supplies; 2) sharing regional infrastructure through cost-effective wheeling and/or recharge agreements; 3) constructing additional recharge projects to maximize use of effluent for Assured Water Supply purposes; 4) using cost analysis to compare effectiveness of various conservation measures against supply acquisition; and 5) managing risk and addressing uncertainty by investing in additional water supplies, demand management, and critical infrastructure.

Those goals and recommendations that I strongly believe need further deliberation and/or specific clarifying amendments prior to final approval of the Phase 2 Report are detailed below:

* Staff's goals and recommendations include support of cost analysis methods to inform water management decisions, but there are significant policy endorsements regarding rainwater harvesting and reallocating water for the environment that lack such analysis. Prior to final approval of the numerous recommendations and statements in the report associated with these two issues, I recommend adding qualifying language committing: 1) to study the cost-effectiveness and reliability of rainwater harvesting compared to other demand management and supply augmentation alternatives; 2) to study the net benefits associated with reallocating water out of municipal providers' supply portfolios for specific environmental restoration projects and compare to net benefits of use in municipal and industrial sectors prior to finalization of reallocation decisions; 3) to determine which supplies (stormwater, effluent, or potable) are most suitable and cost-effective for environmental restoration projects and how to equitably finance projects

such that costs are shared by all beneficiaries.

* Staff's report includes an unfair characterization of the purpose and role as well as the challenges facing the Central Arizona Groundwater Replenishment District (CAGRDR) in the Tucson AMA. Every water provider in the region (including Tucson Water) withdraws water outside the area where recharge occurs. Significant volumes of water are withdrawn from recovery wells outside the "area of impact" in the service areas of water providers with Designations of Assured Water Supply, contributing far more to groundwater declines in the Tucson AMA than CAGRDR membership. I recommend deleting those sections of the report that wrongly attribute regional groundwater declines and the so-called "pumping/recharge disconnect" to the CAGRDR and its members. See also letter from CAWCD on this issue

* Staff's report and the City of Tucson's Strategic Plan, proposes seven factors to be considered in deciding whether to extend water service. As described in the City Manager's August 10th memorandum to the Council, these seven planning factors are to be considered in a long-range land use planning context. This would entail identifying sub-regional areas that are appropriate to extend service. The Oversight Committee asserted that Staff's analysis of potential expansion areas should be timely, address equity, and be updated periodically. I would like to restate the Committee's position that the Obligated to Serve policy should be revisited immediately, particularly given the current economic/fiscal condition of our community. The City Manager's August 10th memo recommends that Mayor & Council formalize the Water Service Policy in early 2010 following completion of the Phase 2 Report, and that the seven planning factors should be considered in their deliberations. I hope would hope that deliberations focus specifically on near-term economic/fiscal benefits associated with extending service to parcels near existing infrastructure in identified growth areas, particularly those that are part of TREO's efforts to provide "shovel ready" land inventory.

* Staff's section titled "Comprehensive, Integrated Planning" drifts too far into urban form/design for a study centered on water management. Not enough time was spent on these topics to warrant the detailed recommendations found in this report. Issues such as encouraging mixed use development, density, housing diversity, transportation options, access to jobs, etc are important and complex topics that should be fully discussed in the regional land planning process, but eliminated from this report. Finally, recommendations and statements attributing current infrastructure deficits and budget challenges to growth should

be substantiated and/or rewritten with a more balanced tone and understanding of measurable economic/fiscal benefits such as job creation and sales/income/property tax generation, etc.

I appreciate your consideration of these issues during your discussion on February 9th. Thank you.

Sincerely,

Vince Vasquez
CWAC Member
City/County Oversight Committee Member