



# Coalition for Sonoran Desert Protection

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Arizona Center for Law in the Public Interest  
Arizona League of Conservation Voters Education Fund  
Arizona Native Plant Society  
Center for Biological Diversity  
Center for Environmental Connections  
Center for Environmental Ethics  
Defenders of Wildlife  
Desert Watch  
Drylands Institute  
Environmental and Cultural Conservation Organization  
Environmental Law Society  
Friends of Cabeza Prieta  
Friends of Tortolita  
Gates Pass Area Neighborhood Association  
Neighborhood Coalition of Greater Tucson  
Northwest Neighborhoods Alliance  
Oro Valley Neighborhood Coalition  
Protect Land and Neighborhoods  
Safford Peak Watershed Education Team  
Save the Scenic Santa Ritas  
Sierra Club-Grand Canyon Chapter  
Sierra Club-Rincon Group  
Silverbell Mountain Alliance  
Sky Island Alliance  
Sky Island Watch  
Society of Ecological Restoration  
Sonoran Arthropod Studies Institute  
Sonoran Permaculture Guild  
Southwestern Biological Institute  
Tortolita Homeowners Association  
Tucson Audubon Society  
Tucson Herpetological Society  
Tucson Mountains Association  
The Wildlands Project  
Women for Sustainable Technologies

Mayor Walkup and Councilmembers  
City of Tucson  
P.O. Box 27210  
Tucson, AZ 85726

**RE: City/County Water and Wastewater Study Phase II Report**

Dear Mayor Walkup and City Council Members:

The Coalition for Sonoran Desert Protection urges you to support the City/County Water and Wastewater Study Phase II Report and direct City staff to proceed, in cooperation with Pima County and other participants, with implementation of the recommendations contained within the report.

We value the thorough and transparent public process undertaken during the development of this report, and the dedication by members of City and County staff over the last 21 months. The 12-member Oversight Committee, appointed by the Tucson Mayor and Council and Pima County Board of Supervisors, gathered testimony from a wide range of community interests during 36 public meetings. The recommendations before you are the result of close to two years of research, study, analysis and public deliberations, which the community has watched and participated in with keen interest.

The need for a “New Paradigm,” as expressed by the Joint Committee, is indeed true. Communities throughout the country understand and embrace this, as evidenced by the evolution of “Smart Growth” principles over the last two decades. Locally, the Coalition has worked successfully with local jurisdictions, particularly with Pima County and the Town of Oro Valley, to enact policies that integrate water resource and land use planning. The definition of a sustainable water future, based on the pillars of comprehensive integrated planning, water supply, and respect for the environment, is well thought out and forward-thinking. We appreciate that “Respect for the Environment” is included as a central tenet in this report. The citizens of our region have a long history of supporting the preservation of our natural environment, perhaps most strongly exemplified by the values of the Sonoran Desert Conservation Plan.

Because of our long-standing community value for riparian protection in particular, we were shocked to see the recent coordinated effort by the homebuilding community requesting that the Mayor and Council reject the use of effluent for environmental purposes. In addition, the homebuilding and development interests are asking the City not to enter into an agreement that was already entered into and signed by the City and the County (Mayor Walkup and Chairwoman Bronson, respectively) in February 2000. This agreement was seen by the community as a “watershed event,” and outlined a wide range of agreed-upon issues surrounding effluent, including a commitment to reserve a specific

amount of effluent for riparian projects benefiting the entire community. This reserve is known as the Conservation Effluent Pool (CEP).

The Coalition supports the recommendations made regarding riparian habitat, groundwater dependent ecosystems, and the perpetuation of the CEP. The goals and recommendations outlined on pages 29-36 of the report clearly outline a path forward for all participants to prudently and thoughtfully utilize our water supply to protect and encourage riparian habitat and groundwater dependent ecosystems.

The CEP is an essential tool needed to achieve these goals and we encourage the Mayor and Council to direct staff to continue to work on detailing how the CEP will be managed and utilized. This increased specificity will lead to improved management of the CEP, benefiting both the owners of this resource and the riparian habitat that depends on it.

Please reject the recommendation, which is re-stated by multiple members of the development and building industry in their recent comments, that cost-benefit analyses should be completed “before the City and County enter into an agreement committing 10,000 acre-feet of effluent to environmental restoration.” First, this agreement, which recharges reclaimed water and allows it to benefit the environment, was already made ten years ago. Secondly, this recommendation is based on misinformation and seems to imply an alternative agenda for using this effluent pool, such as for golf courses or for drinking water, an option our community has expressed grave concerns about due to a current inability to adequately purify effluent to remove pharmaceuticals and other potentially noxious substances.

Finally, the City of Tucson has invested considerable resources into projects such as the development of two Habitat Conservation Plans (HCPs), El Rio Medio, Tres Rios del Norte, the restoration of Atterbury Wash and Arroyo Chico, and policies and ordinances that protect riparian habitat and could count as credit with the HCPs going forward. The Phase II Report serves as an important complement to these projects. As noted on page 64, one of the important successes to already surface as a result of this study is an increased level of cooperation between the City and the County. By supporting the Phase II Report and endorsing its implementation, all of these other projects will also benefit from the resultant shared expertise and increased cooperation.

Thank you for considering our input on this important project.

Sincerely,



Carolyn Campbell  
Executive Director

Cc: Mike Letcher, Tucson City Manager  
Nicole Ewing-Gavin, City of Tucson  
Melaney Seacat, Pima County  
CH Huckelberry, Pima County Administrator  
Chairman and Members, Pima County Board of Supervisors  
James Barry, Chair, City / County Joint Oversight Committee



## *A Declaration of the Board of Supervisors of Pima County, Arizona to Work Cooperatively with the City of Tucson in Developing the Sonoran Desert Conservation Plan and Carrying Out the Riparian Restoration Projects*

WHEREAS, on March 2, 1999, the Board adopted the Sonoran Desert Conservation Plan in concept; and

WHEREAS, the Sonoran Desert Conservation Plan is the largest and most comprehensive regional multi-species conservation plan in the United States; and

WHEREAS, on December 3, 1998 the Board entered into Resolution 1998-250 with the Secretary of the Interior to:

- (1) support the underlying purpose of the Endangered Species Act which is to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, and
- (2) work with the Department of the Interior to develop the Sonoran Desert Conservation Plan; and

WHEREAS, on February 8, 2000, the Board agreed to enter into a Supplemental Intergovernmental Agreement with the City of Tucson which included provisions relating to effluent or reclaimed water for riparian projects; and

WHEREAS, under the Supplemental Intergovernmental Agreement a Conservation Pool is established for riparian projects; and

WHEREAS, under the Sonoran Desert Conservation Plan, 12 habitat types and 20 plant communities are being considered for protection, including riparian habitat which has been substantially degraded

NOW THEREFORE BE IT DECLARED THAT THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA, as follows:

Pima County by entering into a Supplemental Intergovernmental Agreement on effluent management will work cooperatively with the City of Tucson to develop the Sonoran Desert Conservation Plan Riparian Restoration Element.

SIGNED THIS 21<sup>st</sup> day of March, 2000.

PIMA COUNTY BOARD OF SUPERVISORS

*Sharon Bronson*

Chair of the Board

*[Signature]*

Secretary of the Interior

*[Signature]*

Mayor of Tucson

