

**WATER AND WASTEWATER : Infrastructure, Supply and Planning Study.  
Phase 2, Final Report, December 2009**

**Comments from Priscilla Robinson, February, 2010.**

The introduction to the Phase 2 Report sets forth the purposes as a “new paradigm” for water planning. With the exception of the environmental statements, the focus on sustainability, supply, and demand and provision of water for the long term future closely track the purposes of the 1980 Groundwater Management Act of 1980. Although the GMA is the central fact of water management in this AMA, it is hardly mentioned.

Much of the state adopted a new paradigm for water in 1980. Amounts of water that can be pumped have been in effect for 30 years. In place of “take whatever you can grab before someone else does” the law today is “take whatever the law allows”. And no more.

**General Comments:**

The focus on environmental concerns as adopted policy is new, significant and possibly a landmark decision among local jurisdictions. The 1980 law does not and was not intended to provide any protection for the environment . Such a law could not have been passed in 1980. Or in 2010 for that matter. Region wide adoption of measures to protect the environment in water planning would be a remarkable accomplishment.

The second, and equally important, new idea is the general theme throughout the document that extension of water service, wastewater planning, and other factors should all be considered together in design of urban form. This is an important step away from the haphazard, reactive, piecemeal, wasteful approach that has dominated our urban development. It is significant that this is tied together with water efficiency as well as cost controls. If this new approach can actually be translated into action, even if only piecemeal by the City and County, it will be a significant achievement.

**The Next Step**

As the two jurisdictions begin the process of involving the rest of the region, it is important to understand the differences between the concerns and priorities of Tucson Water and Pima County and the regional water community. With its fat water portfolio, developed infrastructure and adequate revenue stream, Tucson Water can afford to take on other issues. The situation in the Tucson AMA as a whole is quite different. No such plans exist for most of the 118,000 AF of CAP allocation held by a dozen other entities, including municipal providers, towns the State Land Department and the San Xavier and Schuk Toak Districts.

It will not be possible to achieve anything close to balancing the AMA water budget without using this water. Taking and using this 100,000 plus AF of available water is

arguably the most important water issue in the region. However, nothing in this very interesting and extensively detailed study addresses this issue or anything related to it.

Other major issues include, reaching safe yield, and planning for shortages. The CAP's ADD Water project, management of the Arizona Water Bank, relations with other Colorado water users and the proper role of the CAGRDR are all part of the regional agenda. Numerous other agencies are involved, including the Arizona Water Bank, CAP and its subsidiary, CAGRDR, as well as the TAMA office of DWR. The planning document makes scant reference to any of these critical agencies, except for an expression of dislike for CAGRDR. I was opposed to CAGRDR 20 years ago when the law was passed, but it is now part of the landscape.

Recent budget cuts have curtailed but not eliminated, the ability of DWR to continue to play lead role in water management decision making, although the recently completed analysis of progress toward the goal of Safe Yield by 2025 would contradict that conclusion. The Tucson AMA office continues to be the primary source for water facts of all kinds and information from that source should be used to substitute for the Tucson Water service area-specific data, clearing up that confusion. Everyone is entitled to their own opinions, but not their own facts.

CAP is unaffected by the state's budget woes and has been recently building and strengthening its senior policy staff. It will increasingly play a lead role in future decisions of all kinds, particularly in interstate matters.

It appears from the document that the drafters anticipate reaching out to other jurisdictions. This is a good idea, but the numerous agencies and venues are equally important. The issues in this report will be moving onto an already rather crowded agenda.

### **Specifics**

It would be well to review the document to identify potential barriers to regional cooperation that may have inadvertently appeared

One of these, Item 4 in the recommendations from the Oversight Committee for adoption by the Mayor and Council and Board of Supervisors, is somewhat troubling. The recommendation appears to ask the two bodies to sign on to this report as their official position in any regional discussion prior to commencement of any regional talks. This suggests that the City and County have already determined the outcome of any regional dialogue and will not be swayed by any concerns from other entities. Hopefully, this is not the case. Perhaps this recommendation could be rephrased.

Back in the 80's the City took a similar position with regard to what was hoped to be a regional water committee. The City was adamant that it be given a majority of the voting power. The only lasting consequence of that entire endeavor was that Santa Cruz County and the City of Nogales succeeded in getting the legislature to create a separate

Santa Cruz AMA in order to avoid having the City of Tucson control its water future. The Santa Cruz AMA was then and remains at safe yield, while the Tucson AMA lost significant water resources. Beware the unintended consequences of overreaching.

It would be helpful if the term “sustainability” could be compared to the statutorily mandated and defined term, “safe yield.” Do they differ, and if so how? Since much existing data is compared to the statutory bench mark, it would facilitate moving from a Tucson Water centered plan to a regional plan..

The suggestion on page 28 that the city investigate the possibility of wheeling CAP water through the City’s potable water system to Metro/Hub to facilitate use of their CAP allocation is exactly the kind of useful cooperative project that is needed.

Many members of the committee seemed concerned about the need to find additional water supplies because we are “running out water.” (page 7) We have hardly begun to make efficient use of the water we already have. As long as we are letting over 100,000AF go by the board, we probably should not be making a public fuss about acquiring additional supplies. Increased efficiency is the cheapest source of new water. This cannot be repeated too often.

*Full disclosure: I was employed by Tucson Water on three separate occasions, the earliest being in 1974 to assist in lobbying and community relations for an aborted project to introduce a new water law for Arizona. A few parts of it survived to 1980. The second time was in the 80’s when my organization conducted the community participation program on location and design of the CAP treatment plant. The final time was as a consultant to TW during the turbulent times in the 90’s.*

*I represented Santa Cruz County at the legislature in obtaining the separate Santa Cruz AMA. Hugh Holub represented the City of Nogales. We were a tandem act.*

Priscilla Robinson