

May 3, 2010

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Honorable Mayor Bob Walkup and Council Members
City of Tucson
P.O. Box 27210
Tucson, Arizona 85726

SUBJECT: Proposed Tucson Water Service Area Policy

Dear Mayor Walkup and Council Members:

We want to commend you for the leadership you have demonstrated related to the management of water resources. In concert with Pima County, you appointed the Joint Water and Wastewater Committee, approved an interim water policy, and subsequently adopted the reports completed by the Joint Committee as a guideline for future water policy. You are now moving forward with formalization of a water service area policy, which will define the geographic footprint where Tucson Water will extend water service. These are all commendable steps as you manage the critical water supply for our future.

We offer the following comments and suggestions for your consideration as you review and finalize the draft policy:

1) Land Use and Water Resources Planning--City staff indicated there was no time to work with land use counterparts in other jurisdictions. These two activities need to be coordinated to formulate a robust water policy. One of the goals in the Joint Committee's Phase 2 Report outlines how important this linkage is for sound results. We know the planning staff has been reduced, and there are 10 jurisdictions involved, but it is imperative to have some effort in this direction.

2) Partnership with Pima County--It is important that the City and County work together to conduct comprehensive water resource planning in order to identify sustainable water resources to serve the Tucson area. The initial 45 days for City staff to submit a proposal to the Council for review, and the following 30 day period for public comment, does not address the need for a more comprehensive effort to ensure the best results. The results have been described as qualitative and not quantitative. The outcome likely will change if both sides of this equation are addressed and the County staff is included in this process.

3) Areas of Growth--The proposed water footprint outlines areas for water service that are outside the four areas recommended in the Phase 2 Report. There is not much logic for some of the pink and pink/cross hatched areas outside the City boundaries and Tucson Water's current service area. Exceptions might be in the Northeast area where so many residents are on wells and Tucson Water completely surrounds the properties, and the four designated growth areas. Comparatively, there are several areas in the foothills of the Tucson Mountains on the west side that will extend into environmentally sensitive

ecosystems. Pima County objected to inclusion of these areas on the draft "Proposed Tucson Water Service Area" map we were provided for review. We recommend that these areas be deleted from the geographic footprint to ensure planning consistency, since they impact: 1) important riparian areas, 2) wildlife corridors, 3) open space that provides a community-wide view shed, and 4) tourism on the key designated scenic routes to Tucson Mountains Park, Saguaro National Park, and the Desert Museum.

4) Adjacent Infrastructure--If the City uses adjacent infrastructure as a primary decision factor, Tucson Water will be forever expanding into the outer reaches of the Tucson metropolitan area. The focus needs to be on the 1.1 million people who can be served with some reserve if the City is denied future allocations of water. We were told by City staff that adjacent infrastructure is the reason for expansion into the areas on the west side mentioned above. This is inconsistent if you give equal weight to other decision criteria adopted by the Council, especially land that is environmentally sensitive, and when the citizenry wants it protected from development.

5) Water Harvesting and Other Technologies--It was puzzling to review the memorandum from the City Manager entitled "Discussion of Refinements to Water Service Area" and not locate any mention of water harvesting or other technologies that can help residents access renewable supplies of water (e.g., Watershed Management's curb-cut project south of the UofA campus). If we do not emphasize alternative water supplies that are more neutral to the environment, there will be a large carbon footprint related to tapping aquifers elsewhere in Arizona. This will dramatically increase the cost of water. These implications were not addressed under financial costs or economic impacts in the memorandum. The focus seems to be on more revenue, which is very critical, but not necessarily the best reason for expanding the water service area. Again, environmental impacts need to be considered, especially in light of the County's Sonoran Desert Conservation Plan.

6) New Paradigm--The paradigm outlined in the Joint Committee's Phase 2 report offers a balanced approach to water resources planning and management. It clearly states sustainability is related to economics, social vibrancy, and environmental viability. This should be the guiding principle that will help as you move forward with modifying and adopting a water policy. We hope you will continue to use it as a foundation for your decision process.

From an overall perspective, the Tucson Mountains Association believes in the need for fiscal responsibility related to the customers of Tucson Water, while ensuring protection of our natural resources. A sound and comprehensive foundation will be possible if you partner with Pima County to ensure integration of water resources and land use planning. Encouraging infill and growth in the four areas recommended by the Joint Committee will go a long way in accomplishing this objective. We strongly support the adoption of a water service area policy to provide a blueprint for Tucson Water, but urge the Council to make some modifications as noted above before the draft is finalized.

Sincerely,

Dr. Edwin A. Verburg
President