

Comments by Sharon Megdal, Ph.D. to the City/County Water and  
Wastewater Study Oversight Committee  
Submitted November 6, 2008 via email

Having listened to all of the comments made at the October 22<sup>nd</sup> and 29<sup>th</sup> meetings, I do not know I can offer a definition of sustainability any better than those provided by speakers to the City/County Water and Wastewater Study Oversight Committee. However, I would like to offer the following thoughts.

When I give talks and lectures on Arizona water management, which I frequently do, I often include the following slide:

### **Safe Yield Management Goal “versus” Sustainability**

- Safe-yield: a water management goal which attempts to achieve and thereafter maintain a long-term balance between the annual amount of groundwater withdrawn in an AMA and the annual amount of natural and artificial recharge in an AMA (A.R.S.45-562 A)
- Sustainability: The ability of current generations to meet their needs without compromising the ability of future generations to meet their needs. (Brundtland World Commission on Environment and Development)

Note that I include the word “versus” in quotes. The groundwater management goal for the Tucson Active Management area is safe-yield. Our regulatory framework does not require sustainability. By rule, it allows draw down of aquifers to 1,000 feet below land surface. It includes different rates of draw down for use of Groundwater by members of the Central Arizona Groundwater Replenishment District versus water suppliers who recover water they themselves have stored. It is because of these and other provisions, that you have storage or replenishment occurring far from groundwater pumping. You have to sometimes look multiple layers into the system to understand why certain actions are undertaken and permissible.

The Arizona Department of Water Resources will be developing its Fourth Management Plans soon. Historically, the development of the management plans has served as a vehicle to take stock of where we are as an Active Management Area and look at our progress toward meeting the safe-yield groundwater management goal. As you have learned, the Tucson AMA is not the same as Pima County but does include metropolitan Pima County. It also includes some growing areas in Pinal County. At this time, it is unclear to me to what extent the development of the Fourth Management Plan will serve as a catalyst for regional discussion of our water management goals.

The Tucson region needs to – and, based on my May 2008 interview study, desires to – determine whether the regulatory framework in place is consistent with *our* water management goals. As this committee has learned through its months of study, there are many interconnected and sometimes disconnected parts to the regulatory framework. As a region, we need to determine what we like or dislike about the regulatory framework and then consider the implications of changes to it. Then we may be able to arrive at a set of recommendations, some of which may require statutory change. Even though people may have different values, we may be able to make improvements to our water management framework that moves us closer to goals that we can all agree upon.